EXHIBIT "A" (2 of 4)

	Case 7:07-cv-02866-CS-GAY <b>53</b> ocume	nt 22 17	Filed 05/07/2008 Page 2 of 13 <sup>55</sup>
1	Robert LeFevr	111 23-17	Robert LeFever
:	a correction officer know which reasons should be	00±0:18 <b>2</b>	□o you see that?
00:48:14 2			A. Yes.
00:48:16 <b>3</b>	in the P-1 and which reasons don't have to be	00:10:10 3	
a 4	listed?	00:50:18 4	Q. Is there anything in any written
ν 5	A. Yes.	00:50:22 5	policy or procedure that indicates what
00:4521 6	Q. What is that?	d0:50:25 <b>6</b>	appropriate housing should be, based on the
00-4521 7	<ul> <li>A. Again, it's experience; just the</li> </ul>	aa:50:27 <b>7</b>	results of a suicide screening form?
00:4827 8	higher level item issues would be on the	co:5c:29 <b>&amp;</b>	A. No.
вояваа 9	memorandum.	co:sc:∞ 9	Q. Any practices or training as far as
рэяв <b>26</b> 10	Q. Such as?	c0:sc:30 10	you're aware?
90;48:27 <b>11</b>	A. Agitated; you know, incoherent.	00:50:34 11	A. No.
<sub>приври</sub> 12	Things like that.	00:50:34 12	Q. And in terms of the "Other"
ознова 13	Q. How about if somebody had a high	00:50:35 13	classification determination, do you have any
B0:48:37 14	score of eight or more on a suicide prevention	00:50.41 14	understanding as to what that refers to?
CD:48:39 15	form, would that be on a P-1?	30-50.43 15	A. Victimization, hostile relations,
co:48:41 <b>16</b>	A. No.	20:5247 16	prior incarcerations or lack thereof.
co:48:41 <b>17</b>	Q. Would anything about the answers on	02000 17	Q. Number 7 refers to "Initiate the
		525102 18	required documentation for prisoner referral to
coste:46 18	the Suicide Prevention Screening Guidelines be in	00:51:02 10	appropriate health service agency, if required."
CO:48:45 19	the P-1?	002105 19 000108 20	is that the Mental Health Routing
co:18:49 <b>20</b>	A. Not necessarily.		- }
c0:48:50 <b>21</b>	Q. Under what circumstances would it	05/51:50 21	Sheet that you referred to earlier?
c0:48:51 <b>22</b>	be, and what circumstances wouldn't it be?	cost::1 22	A. Yes.
CC:45:54 <b>23</b>	A. If there was a significant	co#1:12 <b>23</b>	Q. Anything else?
20:45.5B 24		00:51:19 <b>24</b>	A. No.
20-45.5× 25	Q. If an inmate came into the facility	00:51:10 25	Q. Flip to the next page, Article 15-3,
•	COMPU-TRAN SHORTHAND REPORTING	l .	COMPU-TRAN SHORTHAND REPORTING
<u> </u>	***		
-	54	·	56
1	***	1	56 Robert LeFever
1 100×1000€ 2	54 Robert LeFever	1 >>51:43 2	56
1 box49x6 2 b9x49:11 3	54 Robert LeFever		56  Robert LeFever  Mental Health Referral Policy.  Do you see that section?
_	54  **Robert LeFever** having a history of addiction or significant history of drug use or alcohol use, would that be	po 51:43 <b>2</b>	56  Robert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.
D2:40:11 3	54  **Robert LeFever**  having a history of addiction or significant history of drug use or alcohol use, would that be	>: 51:43 2 0> 51:45 3	56  Robert LeFever  Mental Health Referral Policy.  Do you see that section?
00:49:14 <b>4</b>	54  Robert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1?	00-51-45 3 00-51-46 4	56  Robert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.
00:40:11 3 00:40:14 4 00:49:16 5	54  Robert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1?  A: No.	00-51-45 2 00-51-45 3 00-51-46 4 00-51-47 5	76  Robert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.  Q. Go to the next page, which has
00:49:14 4 00:49:14 5 00:49:17 6	54  Robert LeFever  having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1?  A: No.  Q. If an inmate was placed on a heightened level of supervision, like a constant	00-51-45 2 00-51-45 3 00-51-46 4 00-51-47 5 00-51-49 6	Fobert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.  Q. Go to the next page, which has letter D, Procedural Guidelines. "Tour
03:49:14	Fobert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1? A: No. Q. If an inmate was placed on a	00-51-45 2 00-51-45 3 00-51-46 4 00-51-46 5 00-51-46 6 00-51-84 7	Robert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.  Q. Go to the next page, which has letter D, Procedural Guidelines. "Tour supervisor will" Do you see that?
02:49:11 3 02:49:14 4 00:49:15 5 00:49:17 6 00:49:24 7 00:49:27 8 00:49:27 8	Pobert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1? A: No. Q. If an inmate was placed on a heightened level of supervision, like a constant watch or a 15-minute watch, would that be in the P-1?	20:51:43 2 00:51:45 3 00:51:46 4 00:51:47 5 00:51:49 6 00:51:42 7 00:51:42 8	Robert LeFever  Mental Health Referral Policy. Do you see that section?  A. Yes. Q. Go to the next page, which has letter D, Procedural Guidelines. "Tour supervisor will" Do you see that?  A. Yes.
02:49:11 3 02:49:14 4 00:49:10 5 00:49:17 6 00:49:24 7 00:49:27 8 00:49:29 9 00:49:20 10	Pobert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1?  A: No.  Q. If an inmate was placed on a heightened level of supervision, like a constant watch or a 15-minute watch, would that be in the P-1?  A. That's what the P-1 would say, yes.	00-51-45 2 00-51-46 4 00-51-46 4 00-51-46 5 00-51-47 5 00-51-57 7 00-51-57 8 00-51-57 9	Robert LeFever  Mental Health Referral Policy. Do you see that section?  A. Yes. Q. Go to the next page, which has letter D, Procedural Guidelines. "Tour supervisor will" Do you see that?  A. Yes. Q. If you take a look at Number 1,
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00:49:14	Robert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1?  A: No.  Q. If an inmate was piaced on a heightened level of supervision, like a constant watch or a 15-minute watch, would that be in the P-1?  A. That's what the P-1 would say, yes.  Q. And in terms of that P-1, if somebody was placed on a 15-minute supervisory visit or a constant watch and the reason for it related to a history of drug or alcohol use, should that go in the P-1?  A. Not necessarily.  Q. If the reason for the heightened level of supervision was answers on a suicide screening form, should that go in a P-1?  A. No.  Q. In terms of the policies again, Exhibit 2, Number 6 it says, "The booking officer shall assign appropriate housing based	20:51:43 2 00:51:45 3 00:51:46 4 00:51:47 5 00:51:47 6 00:51:47 7 00:51:57 8 00:52:50 10 00:52:50 11 00:52:50 12 00:52:50 14 00:52:50 15 00:52:50 16 00:52:50 17 00:52:13 18 00:52:13 18 00:52:15 19 00:52:15 19 00:52:15 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20	Robert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.  Q. Go to the next page, which has letter D, Procedural Guidelines. "Tour supervisor will" Do you see that?  A. Yes.  Q. If you take a look at Number 1, small letter (d): "Tour supervisor will ensure that appropriate supervision is given to any prisoner who is determined to be a threat to himself or herself."  Do you see that?  A. Yes.  Q. And in terms of making a determination as to whether somebody's a threat to himself or herself, is that based on the suicide prevention screening results?  A. Yes.  Q. So, if there is a score of eight or higher, that person would be considered a threat to himself or herself?
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00:49:14	Robert LeFever having a history of addiction or significant history of drug use or alcohol use, would that be in a P-1?  A: No.  Q. If an inmate was piaced on a heightened level of supervision, like a constant watch or a 15-minute watch, would that be in the P-1?  A. That's what the P-1 would say, yes.  Q. And in terms of that P-1, if somebody was placed on a 15-minute supervisory visit or a constant watch and the reason for it related to a history of drug or alcohol use, should that go in the P-1?  A. Not necessarily.  Q. If the reason for the heightened level of supervision was answers on a suicide screening form, should that go in a P-1?  A. No.  Q. In terms of the policies again, Exhibit 2, Number 6 it says, "The booking officer shall assign appropriate housing based upon the results of the completed form Number 330	20:51:43 2 00:51:45 3 00:51:46 4 00:51:47 5 00:51:47 6 00:51:47 7 00:51:57 8 00:52:50 10 00:52:50 11 00:52:50 12 00:52:50 14 00:52:50 15 00:52:50 16 00:52:50 17 00:52:13 18 00:52:13 18 00:52:15 19 00:52:15 19 00:52:15 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20 00:52:16 20	Robert LeFever  Mental Health Referral Policy.  Do you see that section?  A. Yes.  Q. Go to the next page, which has letter D, Procedural Guidelines. "Tour supervisor will" Do you see that?  A. Yes.  Q. If you take a look at Number 1, small letter (d): "Tour supervisor will ensure that appropriate supervision is given to any prisoner who is determined to be a threat to himself or herself."  Do you see that?  A. Yes.  Q. And in terms of making a determination as to whether somebody's a threat to himself or herself, is that based on the suicide prevention screening results?  A. Yes.  Q. So, if there is a score of eight or higher, that person would be considered a threat to himself or herself?

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1 Robert LeFever 1	Robert LeFever
Control 2 (Copy in the Copy in	aff have any role in determining level of
OSSESS Superior Super	pervision that's instituted for an incoming
y 4 correct? (005417 4 in)	mate?
a / 5 A. Yes.	A. Yes.
8055234 6 Q. So, if a correction officer failed 8055424 6	Q. What is their role?
40:52:55 7 to do that, a tour supervisor would have that	A. If they see a medical problem, like
E83235 O COCK OF COSPONOIONAY	gh blood pressure, they may put someone on a
LU;3235 V A. 1431	5-minute supervision.
90,5230 10 Q. Is that one of the reasons why a	Q. How about if it's not a medical but
Water 11 Code Department to 1 and 1	mental issue, such as a suicide risk
12 screening form?	A. No.
00002:44 13 A. Yes. 00004:17 13	Q does AmeriCor have any role in
1 100 Up 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	etermining a level of
cossess 15 small letter (e): "Forward a copy of screening cossess 15	A. No.
00.52.54 16 form Number 330 ADM with the inmate if he she is 00.58.50 16	Q supervision?
∞ s2±8 17 being referred to a health-service provider."	Q. Are you aware of whether or not
65555C IB DO YOU SEE CHOC.	meriCor staff reviews the Suicide Prevention
003301 10	creening Guidelines for an incoming inmate?
coissin 20 Q. Is it in fact practiced that the	A. No.
cosses 21 inmate gets a copy of the suicide screening form?	Q. You're not aware; or no, they don't?
50.5331 22 A. No. 90:55.10 22	A. I'm not aware.
ωss.15 23 Q. And how is it, then, that that form ωss.11 23	Q. Are you aware of any training that's
1000 ET 13 TOT WEST SECTION SE	een given to any of the medical staff from
003027 EG 711 THE THE STATE OF	meriCor?  COMPU-TRAN SHORTHAND REPORTING
COMPU-TRAN SHORTHAND REPORTING	60
58	Robert LeFever
Abbert Lei eyes	A. In regards to?
1003324 Z	Q. Suicide prevention.
asisasis 3 Medicar on IC awiis	A. Yes.
00,5056 4 A. Yes. The form goes to medical on	Q. And when did that training begin?
cusace 5 its own.	A. Last year,
cc;5322 6 G. Interns of medical, are journal	Q. In 2007?
20:3322 / Of any requirements that they see an invited	A. In '07.
103535 6 Within any Certain manuer of days at hours of	Q. And whose determination was that?
100:00:07 9 Cited arrived at the requiry:	A. Myself and Sheriff Smith.
0.5539	Q. And did that come about as a result
42 0	
and the or procedure.	<del></del>
00:53.49 13 A. Policy and procedure, no. 05:55.42 7.5	of a discussion that you had with Smith?  A. Yes.
	f a discussion that you had with Smith?  A. Yes.
20.53348 14 Q. That's the practice in the jail?	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that
00.53:46       14       Q. That's the practice in the jail?       00.55:42       14         00.55:48       15       A. Yes.       00.55:44       15       d	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?
00.53348 14       Q. That's the practice in the jail?       00.5348 15       A. Yes.       00.5548 15 d         00.5348 16       Q. And for how long has that been true?       00.5548 16 d	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved.
00.53348 14       Q. That's the practice in the jail?       00.53348 15       A. Yes.       00.55348 15 d         00.53348 16       Q. And for how long has that been true?       00.5544 16 d         00.53341 17       A. Since we started with the contract       00.5547 17 T	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved. They were involved in the medical piece and just
00.53348 14       Q. That's the practice in the jail?       00.5348 15       A. Yes.       00.5544 15 d         00.5348 16       Q. And for how long has that been true?       00.5544 16         00.5348 17       A. Since we started with the contract       00.5547 17 T         00.5348 18 service.       18 n	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide
00.53348 14       Q. That's the practice in the jail?       00.55348 15       A. Yes.       00.55348 15 d.         00.55348 16       Q. And for how long has that been true?       00.5544 16 d.         00.55348 17       A. Since we started with the contract       00.5547 17 T.         00.5535 18 service.       00.5536 18 m.         00.5536 19       Q. AmeriCor?       00.5532 19 s.	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide discreening after the fact was — was we just
00.53348 14       Q. That's the practice in the jail?       00.55348 15       A. Yes.       00.5544 15 d         00.5348 16       Q. And for how long has that been true?       00.5544 16         00.5049 17       A. Since we started with the contract       00.5547 17 T         00.5046 18       service.       00.5040 18 m         00.5046 19       Q. AmeriCor?       00.5552 19 s         00.5047 20       A. Yes.       00.5552 20 t	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide
00.53348 14       Q. That's the practice in the jail?       00.55348 15       A. Yes.       00.5544 15 d         00.5348 16       Q. And for how long has that been true?       00.5544 16         00.5049 17       A. Since we started with the contract       00.5547 17 T         00.5049 18       service.       00.5549 18 n         00.5049 19       Q. AmeriCor?       00.5549 19 s         00.5049 20       A. Yes.       00.5549 20 t         00.5049 21       Q. And do you know for how long       00.5549 20 t	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide discreening after the fact was was we just thought it would be more appropriate for them to
00.53348 14       Q. That's the practice in the jail?       00.5348 15       A. Yes.       00.5244 15       d         00.5348 16       Q. And for how long has that been true?       00.5244 16       00.	of a discussion that you had with Smith?  A. Yes.  Q. What was the nature of that discussion?  A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide discreening after the fact was was we just thought it would be more appropriate for them to be involved with it.
00.53348 14       Q. That's the practice in the jail?       00.55348 15       A. Yes.       00.55348 15       d. Yes.       00.55348 15       d. 00.55348 15       d. 00.55348 15       d. 00.55348 15       d. 00.55348 16       00.55348 16	A. Yes. Q. What was the nature of that liscussion? A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide screening after the fact was — was — we just thought it would be more appropriate for them to be involved with it. Q. And why is that?
00.53348 14       Q. That's the practice in the jail?       00.5348 15       A. Yes.       00.5444 15       d         00.5348 15       A. Yes.       00.5444 16       00.5444 1	A. Yes. Q. What was the nature of that discussion? A. Just to have medical more involved. They were involved in the medical piece and just not to have them involved with the suicide screening after the fact was was we just shought it would be more appropriate for them to be involved with it. Q. And why is that? A. Because they're part of the medical

	•	Case 7:07-cv-02866-CS-GAY <sup>6</sup> Docume	nt 23-1	7 Filed 05/07/2008 Page 4 of 1 <sup>§3</sup>
	2	Q. And are you aware or, with respect	00:57:31 2	Smith about anything pertaining to what AmeriCor
00:65:54	2	to the training that the medical staff received,	осот:зи 3	indicated it would do?
90056:07	4	if they were told that they have an obligation to	00:57:36 4	A. I don't remember.
1	5	do anything if the score is eight or higher?	00.97:37 <b>5</b>	Q. Including in or about '07 or '06,
"	6	MR. COON: Objection to	00 57/s1 <b>6</b>	when it was determined that medical staff would
00;56:15	7	form.	0357.43 7	be trained?
00:5818	8	A. No.	095744 8	A. No.
00:5817	9	Q. Are you aware if they were told or	c0#8:15 <b>9</b>	Q. Take a look, if you would, at the
G0:56:17	_	trained as to what to do if a shaded area is	co±8;17 10	next page. It's Policy Section 15-4. Do you see
CC:5020		checked?	cosazz 11	that at the top?
00:6522		A. No.	20:58:21 12	A. Yes, Yes.
i		Q. Are you aware of again, since	00:58:24 13	Q. And that section, Article 15-4
055623		that training medical staff making	00:58:27 14	continues to the next page, Number 3: "Tour
ψα-56:26		recommendations to correction officers or	02:55:31	supervisor will, (a): Assure that constant
ψυ;96:27 <sup>*</sup>		sergeants about the level of supervision that		supervision is immediately provided for the
CO:5928		•	cosa37 17	following types of prisoners: One, suicidal
GB:550Z		should be instituted?	CO:58:51 18	prisoners."
00:5523		<ul><li>A. No.</li><li>Q. Other than you and Smith, dld</li></ul>	20:58:42 19	Do you see that?
00:55:30		<del>-</del>	00:53:42 20	A. Yes.
00:56:40		anybody else partake in the discussions about having medical involved in the suicide screening?	02:58:42 2.0	Q. And in terms of that responsibility
00:56:43		_	00.55:49 22	on the part of the tour supervisor, suicidal
00:58.45		A. I don't remember.	003849 22	prisoners, is that determination made based on
CC:55:46		Q. Do you recall if that discussion was	co::859 <b>24</b>	the score of the Suicide Prevention Screening
00:55:48		prompted by anything that was issued by the State		Guideline form?
90:58:53	25	Commission?  COMPU-TRAN SHORTHAND REPORTING	CO:00:02 ZD	COMPU-TRAN SHORTHAND REPORTING
L.			<u> </u>	COM 0-1100 GIOTOTOTOTOTO
!		62		64
		62 Report La Enver	١,	Robert LeFever
	1	Robert LeFever	1	Robert LeFever
G0:58:53	1 2	Robert LeFever A. No.	coso.cz <b>Z</b>	Robert LeFever A. No.
೯೮-५೮ ನನ	1 2 3	Robert LeFever  A. No.  Q. No, it wasn't?	c059.02 <b>2</b>	Robert LeFever  A. No.  Q. What is it based on?
60%5553 90%5534	3 4	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not.	cosoco	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also
90:35:34 30:35:35	1 2 3 4 5	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the	c0:59:02 2 c0:59:03 3 c0:59:07 4	Robert LeFever  A. No.  Q. What is it based on?
90:35:36 90:35:36 90:35:36 90:37:33	3 4	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to	c0:50:62	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could
00:35:36 00:35:36 00:37:33 00:57:05	2 3 4 5 6 7	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal?	0059.02 2 0059.03 3 0059.07 4 0059.07 5 0059.07 5 0059.07 7	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight
00:557:08	2 3 4 5 6 7 8	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes.	c050.02 2 c05953 3 c059597 4 5059597 5 5050.08 6 005977 7	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could
60%5553 60%5544 50%5565 50%57:05 60:57:06	2 3 4 5 6 7 8 9	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a	0059.02 2 0059.03 3 0059.07 4 0059.07 5 0059.07 5 0059.07 7	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes.
00:557:08 00:57:08 00:57:08 00:57:08 00:57:08	2 3 4 5 6 7 8 9	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into.	c0:50:02 2 c0:59:03 3 c0:59:07 4 50:59:07 5 50:59:08 6 60:59:17 7 00:58:14 8 60:59:16 9 c0:59:15 10	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or
00:55:05 00:35:06 00:35:05 00:57:05 00:57:06 00:57:06 00:57:06 00:57:06	2 3 4 5 6 7 8 9 10	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that?	c0:50:02 2 c0:59:53 3 c0:59:57 4 50:59:57 5 50:59:17 7 05:59:17 7 05:59:14 8 05:59:15 10 c0:59:15 10	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction
00-9553 00-3534 00-3636 00-57:03 00:57:03 00:57:08 00:57:08 00:57:14 00-57:14	2 3 4 5 6 7 8 9 10 11 12	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes.	c0:50:02 2 c0:59:03 3 c0:59:07 4 50:59:07 5 50:59:08 6 60:59:17 7 00:58:14 8 60:59:16 9 c0:59:15 10	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement
00:3553 00:3554 30:35:35 00:37:35 00:57:08 00:57:08 00:57:08 00:57:08 00:57:44 30:57:14	2 3 4 5 6 7 8 9 10 11 12 13	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as	0050.02 2 005953 3 005957 4 005957 5 005918 7 005814 8 005956 9 005915 10 005917 11	A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor
00:55:55 00:55:05 00:57:05 00:57:05 00:57:06 00:57:06 00:57:14 00:57:14	2 3 4 5 6 7 8 9 10 11 12 13	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well?	c0:50:02 2 c0:59:53 3 c0:59:57 4 50:59:57 5 50:58:18 6 00:58:17 7 00:58:14 8 50:59:50 9 c0:59:15 10 c0:59:17 11 00:59:20 12 50:59:23 13	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement
00-95553 00-35534 00-357:03 00:57:03 00:57:03 00:57:03 00:57:14 00:57:14 00:57:14 00:57:14 00:57:15	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes.	00:50:02 2 00:59:53 3 00:59:57 4 00:59:57 5 00:59:17 7 00:59:14 8 00:59:15 10 00:59:15 11 00:59:15 11 00:59:25 12 00:59:25 13 00:59:25 13	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that
00:55/35 00:35/35 00:35/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Robert LeFever  A. No. Q. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were	0050.02 2 005953 3 005957 4 005957 5 005917 7 005814 8 005915 10 005915 11 005920 12 015923 13 005923 14 005923 14 005928 15	A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out?
00:5553 00:3654 00:3656 00:57:05 00:57:05 00:57:06 00:57:06 00:57:06 00:57:14 00:57:14 00:57:15 00:57:15 00:57:15	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an	0050.02 2 005953 3 005957 4 005957 5 005957 7 005951 8 005955 10 005955 11 005952 12 005952 13 005952 14 005952 14 005952 14 005952 15 005952 16 005952 16	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out? A. Yes. Q. Letter (c) says: "Assure that
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00:5563 00:5564 00:57:05 00:57:05 00:57:06 00:57:06 00:57:06 00:57:06 00:57:14 00:57:14 00:57:15 00:57:15 00:57:15 00:57:15 00:57:22 00:57:24	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Robert LeFever  A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an addendum which listed, on Schedule A, the services that AmeriCor would provide.	0050.02 2 c05953 3 c05957 4 505957 5 5059.08 6 605977 7 605814 8 605957 10 c05915 10 c05915 11 c05925 12 50.5623 13 c05929 16 c05928 17 c05928 17	Robert LeFever  A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out? A. Yes. Q. Letter (c) says: "Assure that
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00:5563 00:5564 00:57:05 00:57:05 00:57:06 00:57:06 00:57:06 00:57:06 00:57:14 00:57:14 00:57:15 00:57:15 00:57:15 00:57:15 00:57:22 00:57:24	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an addendum which listed, on Schedule A, the services that AmeriCor would provide. Do you recall that? A. Yes.	00:50:02 2 00:59:03 4 00:59:07 5 00:59:07 7 00:59:14 8 00:59:15 10 00:59:15 11 00:59:25 12 00:59:25 13 00:59:25 14 00:59:25 14 00:59:25 15 00:59:25 16 00:59:25 17 00:59:25 18 00:59:25 19 00:59:25 19	A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out? A. Yes. Q. Letter (c) says: "Assure that active supervision is immediately provided for prisoners who are intoxicated by drugs or alcohol, but who do not appear to be a danger to
00:56:56 00:56:56 00:57:05 00:57:05 00:57:06 00:57:06 00:57:06 00:57:14 00:57:14 00:57:15 00:57:15 00:57:15 00:57:25 00:57:25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an addendum which listed, on Schedule A, the services that AmeriCor would provide. Do you recall that? A. Yes. Q. Did you review that at that time,	6050.02 2 c05953 3 c05057 4 505957 5 5058.08 6 055817 7 055814 8 55555 9 c05955 10 c05955 11 c05952 12 505922 15 c05923 16 c05923 16 c05923 17 c05923 18 c05923 18 c05924 19 505944 20 c05945 21 c05938 22	A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out? A. Yes. Q. Letter (c) says: "Assure that active supervision is immediately provided for prisoners who are intoxicated by drugs or alcohol, but who do not appear to be a danger to themselves or others."
00:55/35 00:55/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No. Q. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an addendum which listed, on Schedule A, the services that AmeriCor would provide. Do you recall that? A. Yes. Q. Did you review that at that time, also?	0050.02 2 005950 3 005950 5 005950 6 005951 8 005951 10 005951 11 005952 12 005952 14 005952 15 005952 16 005952 17 005952 19 005952 19	A. No. Q. What is it based on? A. It's based on the score and also observation; subjective, again. Q. But one of the determinations could be made solely on the basis of the score of eight or more? A. Yes. Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out? A. Yes. Q. Letter (c) says: "Assure that active supervision is immediately provided for prisoners who are intoxicated by drugs or alcohol, but who do not appear to be a danger to themselves or others." What is "active supervision," as
00:55:55 00:57:05 00:57:05 00:57:05 00:57:05 00:57:05 00:57:15 00:57:15 00:57:15 00:57:15 00:57:15 00:57:15 00:57:25 00:57:25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No. Q. No, it wasn't? A. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an addendum which listed, on Schedule A, the services that AmeriCor would provide. Do you recall that? A. Yes. Q. Did you review that at that time, also? A. Yes.	0050.02 2 005953 3 005957 4 005957 5 005957 7 005914 8 005957 10 005915 10 005915 11 005920 12 005920 14 005920 17 005920 17 005920 17 005920 17 005920 17 005920 17 005920 17 005920 17 005920 18 005920 17 005920 18 005920 20 005920 21 005920 21 005920 23 005920 23	A. No.  Q. What is it based on?  A. It's based on the score and also observation; subjective, again.  Q. But one of the determinations could be made solely on the basis of the score of eight or more?  A. Yes.  Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out?  A. Yes.  Q. Letter (c) says: "Assure that active supervision is immediately provided for prisoners who are intoxicated by drugs or alcohol, but who do not appear to be a danger to themselves or others."  What is "active supervision," as referred to there?  A. Active supervision is our 15-minute
00:55/35 00:55/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35 00:57/35	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. No. Q. No, it was not. Q. When AmeriCor came into the facility, did you review anything pertaining to their proposal? A. Yes. Q. And at some point in time, a contract was entered into. You're aware of that? A. Yes. Q. Did you review that contract, as well? A. Yes. Q. As part of that contract, there were modifications over the years, but there was an addendum which listed, on Schedule A, the services that AmeriCor would provide. Do you recall that? A. Yes. Q. Did you review that at that time, also? A. Yes.	0050.02 2 c05953 3 c05957 4 505957 5 5059.08 6 605977 7 605918 8 605957 10 c05918 11 605928 12 505928 15 c05928 15 c05928 15 c05928 16 c05928 17 c05928 18 605928 17 c05958 21 605958 21 605958 21 605958 22 c05958 23 c05958 24 c05958 25	A. No.  Q. What is it based on?  A. It's based on the score and also observation; subjective, again.  Q. But one of the determinations could be made solely on the basis of the score of eight or more?  A. Yes.  Q. So, if somebody scored an eight or higher on the form, not only would the correction officer have the responsibility to implement constant supervision, but the tour supervisor would also be responsible for ensuring that that was carried out?  A. Yes.  Q. Letter (c) says: "Assure that active supervision is immediately provided for prisoners who are intoxicated by drugs or alcohol, but who do not appear to be a danger to themselves or others."  What is "active supervision," as referred to there?  A. Active supervision is our 15-minute

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	1	Robert LeFever		1	Robert LeFever
ŋ;5 <b>3</b> 55	2	Q. Is that defined anywhere?	01:02:02	2	A. No.
%5¥ <del>5</del> 7	3	A. Yes; in one of our procedures.	01:02:02	3	Q. Would it have been somebody higher
	4	Q. Do you know which one?	61:32:04	4	in the chain of command than you?
. !	5	A. No, I do not.	gi ;09.05	5	A. Yes.
1:00:01	6	Q. So, prisoners who come in, who are	01:02 <b>0</b> \$	6	Q. And do you recall what level?
:00:05	7	visibility intoxicated by drugs or alcohol, are	01,0207	7	A. No.
1.00.51	8	required to be placed on a 15-minute watch?	01:02:07	8	Q. Prior to the form being implemented
1-60:19	9	A. Yes.	01:02:10	9	by Putnam County, do you know if the sheriff at
150:14	-	Q. And if the inmate does not appear to	e1:02:13 <b>1</b>	0	that time reviewed it?
150:14		be at that time intoxicated by drugs or alcohol	ga;02.14 <b>1</b>	11	A. I don't remember.
		but has a history of addiction or significant use	01:02:4		Q. Or if anybody from the
H:D0:18		of drugs or alcohol, is there anything that	01:02:16		
t:00:23 <sup>*</sup>			01:02:17		
11 00.25		requires active or other supervision in that	01:02:17 1		
n <b>c</b> 0:28		case?	01:02:26 1		
11:00:28		A. No.			modification that was done on the form?
1:50-25		Q. Would that be left to the discretion	5n:02:23 1		_
0::00:01		of the correction officer or sergeant?	61.02.25		
01:00:24	19	A. Yes.	Q1 C2.26 1		
01:00:24	20	Q. With respect to the ADM 330 and the	91:52:22 2		
01:05:01	21	form that Putnam County uses, which both have	C1:32:51 2		there is a difference between those two forms?
01:01:04	22	been marked as Exhibit 1 as the state's form,	01:025¥ A	22	
g:-01.07 .	23	Exhibit 3 as the county's form there are	01:02:34 2	23	Q. Other than with counsel?
91·01:\$6		differences in those forms; correct?	01:02:05 2	24	A. No.
01:51:11		A. Yes.	01:02:36	25	<ul> <li>Q. And with respect to the form,</li> </ul>
urwi:rr	10	COMPU-TRAN SHORTHAND REPORTING			COMPU-TRAN SHORTHAND REPORT
-	-	66			68
			6		
	-	Pohorf LaFever	Ì	1	Robert LeFever
	1	Robert LeFever	)   	1 2	
	2	Q. And one of the references pertains	01:02:08	2	itself, you were aware that there was at least
u1:5!;14	2	Q. And one of the references pertains to the bottom section, where it refers to the	01:02:44	2 3	itself, you were aware that there was at least through training a requirement that constant
u1:51;14	2 3 4	Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?	01:02:44 01:02:46	2 3 4	itself, you were aware that there was at least through training a requirement that constant watch be implemented if the score was eight or
u1:51;14	2	<ul><li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li><li>A. Yes.</li></ul>	01:02:44 01:02:46 01:02:43	2 3 4 5	itself, you were aware that there was at least through training a requirement that constant watch be implemented if the score was eight or higher; correct?
u1:81;14 01:91:17 01:01:58	2 3 4	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330,</li> </ul>	01:02:44 01:02:46 01:02:48 01:02:48	2 3 4 5 8	itself, you were aware that there was at least through training a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes.
u1:81;14 01:91:17 01:01:58	2 3 4	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330, specifies in substance that if the score is eight</li> </ul>	01:02:46 01:02:46 01:02:48 01:02:49 01:02:49	2 3 4 5 8 7	itself, you were aware that there was at least through training a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes.  Q. In all of these years, have you ever
01:01:15	2 3 4	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330, specifies in substance that if the score is eight or more or a shaded box is checked or for any</li> </ul>	01:02:44 01:02:46 01:02:48 01:02:48	2 3 4 5 6 7 8	itself, you were aware that there was — at least through training — a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes.  Q. In all of these years, have you ever thought to make that change to the form?
u1:01:14 01:91:17 01:01:59 01:01:15 01:01:24	2 3 4 5 6 7	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330, specifies in substance that if the score is eight</li> </ul>	01:02:44 01:02:46 01:02:43 01:02:49 01:02:49 01:02:49	2 3 4 5 8 7 8	itself, you were aware that there was at least through training a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes. Q. In all of these years, have you ever thought to make that change to the form?  A. No.
u1:61:14 01:91:17 01:01:18 01:01:15 01:01:24 01:01:27	2 3 4 5 6 7 8 9	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330, specifies in substance that if the score is eight or more or a shaded box is checked or for any other reason that is apparent to an intake officer, they not only have to notify the</li> </ul>	01:02:44 01:02:48 01:02:48 01:02:49 01:02:49 01:02:49 01:02:54	2 3 4 5 6 7 8 9	itself, you were aware that there was — at least through training — a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes. Q. In all of these years, have you ever thought to make that change to the form?  A. No.  MR. RANDAZZO: Objection to
01:01:14 01:01:17 01:01:18 01:01:18 01:01:21 01:01:27 01:01:32	2 3 4 5 6 7 8 9	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330, specifies in substance that if the score is eight or more or a shaded box is checked or for any other reason that is apparent to an intake</li> </ul>	01:02:44 01:02:46 01:02:43 01:02:49 01:02:49 01:02:49	2 3 4 5 6 7 8 9	itself, you were aware that there was — at least through training — a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes. Q. In all of these years, have you ever thought to make that change to the form?  A. No.  MR. RANDAZZO: Objection to the form.
01:01:14 01:01:17 01:01:18 01:01:18 01:01:24 01:01:27 01:01:32 01:01:35 01:01:35	2 3 4 5 6 7 8 9 10 11	<ul> <li>Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?</li> <li>A. Yes.</li> <li>Q. And the state form, the ADM 330, specifies in substance that if the score is eight or more or a shaded box is checked or for any other reason that is apparent to an intake officer, they not only have to notify the</li> </ul>	01:02:44 01:02:48 01:02:48 01:02:49 01:02:49 01:02:49 01:02:54	2 3 4 5 8 7 8 9 10	itself, you were aware that there was — at least through training — a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes. Q. In all of these years, have you ever thought to make that change to the form? A. No.  MR. RANDAZZO: Objection to the form. Q. In fact, the Putnam County
01:01:14 01:01:19 01:01:18 01:01:18 01:01:24 01:01:27 01:01:32 01:01:32 01:01:35	2 3 4 5 6 7 8 9 10 11 12	Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?  A. Yes. Q. And the state form, the ADM 330, specifies in substance that if the score is eight or more or a shaded box is checked or for any other reason that is apparent to an intake officer, they not only have to notify the supervisor but also institute constant watch?  A. Yes.	01:02:44 01:02:45 01:02:43 01:02:49 01:02:49 01:02:49 01:02:54 01:02:54	2 3 4 5 6 7 8 9 10 11 12	itself, you were aware that there was — at least through training — a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes. Q. In all of these years, have you ever thought to make that change to the form? A. No.  MR. RANDAZZO: Objection to the form. Q. In fact, the Putnam County
01:01:14 01:01:17 01:01:18 01:01:24 01:01:27 01:01:32 01:01:35 01:01:37 01:01:41	2 3 4 5 6 7 8 9 10 11 12 13	Q. And one of the references pertains to the bottom section, where it refers to the action that should be taken; correct?  A. Yes. Q. And the state form, the ADM 330, specifies in substance that if the score is eight or more or a shaded box is checked or for any other reason that is apparent to an intake officer, they not only have to notify the supervisor but also institute constant watch?  A. Yes. Q. And that says that directly on the	01:02:44 01:02:45 01:02:43 01:02:43 01:02:43 01:02:43 01:02:54 01:02:54 01:02:54	2 3 4 5 6 7 8 9 10 11 12 13	itself, you were aware that there was — at least through training — a requirement that constant watch be implemented if the score was eight or higher; correct?  A. Yes. Q. In all of these years, have you ever thought to make that change to the form? A. No.  MR. RANDAZZO: Objection to the form. Q. In fact, the Putnam County regulations, the Article 15, specifically refers
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1	Robert LeFeve	1	Robert LeFever
00:03:19 2	attended, has anybody ever explained to an	01:05:17 2	A. Inis is handed out at training.
51.Ga22 3	officer that even though the county form does not	01.05:18 3	Q. And is this handed out at every
ę 4	have that language, that's what's required;	01:5621 4	training that you've attended?
5	meaning, constant watch must be implemented if	e1:0±335 <b>5</b>	A. I don't recall.
01,09;25 6	the score is eight or higher?	c1:00:20 <b>6</b>	Q. Do you recall, for example, if it
01:00:30 7	A. Yes.	01:05:25 <b>7</b>	was not your first time attending training but a
01:20:37 8	Q. That's been explained?	05:05:27 <b>8</b>	subsequent time, if you didn't receive a copy of
G1:03:53 9	A. Yes,	oniosad 9	this?
c1:02:03 10	Q. Has anybody pointed out, in all of	D1:0521 10	A. Maybe a couple of times in all the
95:03:35 11	the training, that even though it's not on the	DH:05:34 11	training,
61.03:37 1Z	form, that's what's required?	01,0524 12	Q. And has it always been this form,
01.63:30 13	A. Yes.	01:05:27 13	the 1994 version?
01:59:50 14	Q. So, they've specified that the	015530 14	A. I don't know.
01:20:41 15		01:20:39 \$5	Q. Do you know of any other officer's
01:02:45 16	training sessions?	01:00:43 16	handbooks that have been handed out in training?
o::0x4s 17	A. Yes	01:08:65 17	A. Regarding this?
01:03:44 18	Q. And they've explained in the	   δ:;α5:48 <b>18</b>	Q. Yes.
01:03:47 19		01:0546 <b>19</b>	A. Only this one that I know of.
01.03.50 20	<u> </u>	21:05±0 <b>20</b>	Q. The 1994 version?
01:24:53 23	A. Yes.	01:05:22 21	A. There may have been one, you know,
01:00:53 22		01:05:54 22	from '88. I don't know.
c1:03:55 22		01:05:56 23	Q. But since '94, this is the one
ot:83:57 24		01:25:58 24	that's been handed out?
5100367 <b>25</b>		01:56:59 25	A. I believe so, yes.
313333	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
4	CUMPU-TRAN SOURTOAND RECORTING	1	Octob of the street of the str
<u> </u>	70	i i	72
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	70	1 31:05£0 2	72
1 01:30:54 2 01:30:54 3	70 Robert LeFever		72 Robert LeFever
01:30:56 2	70 Robert LeFever the form.	J1:05:00 Z	72  Robert LeFever  Q. And do you know who created the
01:00:55 Z	70  Robert LeFever  the form,  MR. COON: Objection.  A. I I don't know.	01:05:00 2 01:05:02 3	72  Robert LeFever  Q. And do you know who created the officer's handbook?
01:00:55 3 01:00:55 4	70  Robert LeFever  the form,  MR. COON: Objection.  A. I I don't know.	01:05:00 2 01:05:02 3 01:05:00 4	72  Robert LeFever  Q. And do you know who created the officer's handbook?  A. I believe the State Office of Mental
01:30:55 2 01:30:55 3 01:04:00 4 01:04:00 5	70  Robert LeFever  the form.  MR. COON: Objection.  A. I I don't know.  Q. With respect to the ADM 330, it	01:05:00 2 01:05:02 3 01:05:00 4 01:06:07 5	72  Robert LeFever  Q. And do you know who created the officer's handbook?  A. I believe the State Office of Mental Hygiene.
01:20:55 3 01:00:55 3 01:04:00 4 01:04:00 5	70  Robert LeFever the form.  MR. COON: Objection.  A. I I don't know.  Q. With respect to the ADM 330, it specifically refers to, if a shaded box is checked, institute constant watch; correct?	01:06:02	72  Robert LeFever  Q. And do you know who created the officer's handbook?  A. I believe the State Office of Mental Hygiene.  Q. And is that, then, provided to the
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<b>.</b>	1	Case	7:07-cv-02866-CS-GAY <sup>7</sup> Docume Robert LeFeve:	nt 23	3-17 1	Filed	05/07/2008 Page 7 of 13 <sup>75</sup> Robert LeFever
05:07:00	2	Q.	Was that covered as part of the	D1;58:22	2	Α.	ies.
Q1;07.02	3	training?	·	01:2820	3	Q.	Take a look, if you would, at Page 6.
97.	4	Α.	I believe so.	21:30:53	4	A.	(Witness complies)
•	· ·	Q.	And in terms of this handbook, was	05:08:59	5	Q.	Under the "Detoxification" section
01.67.95	6		stance of it, gone over in the	01:08:03	6	do you see	that, six. Right there. (Indicating)
01:07:08	7	•	asses you've attended?	05:08:09	7	. A.	Okay. Yes.
	8	A.	Yes.	91,00:10	8	Q.	You got that?
B1:07:10	9	Q.	And in terms of this provision, it	\$1;09:11	9	A.	Yes.
a1:07:10	10	_	ne Commission of Correction	01:09:11	_		Do you recall if, during the
01:97:13	• •	regulations		01:02:12			nything was discussed about how
C1:97:15 C1:07:16		_	 Do you know what those regulations	01:03:15			cated here, "Somebody who's
		are?	DO YOU KIIDW WHAT THOSE regulations	01:03:17			g from elcohol or drugs, especially if
01:07:17		A.	No.	d1.05.20			is addicted, can be so physically
05:07:17				C1:09:23			I psychologically uncomfortable that
01:07 17		Q.	Did you ever inquire?	C1.0923		-	y seem like the only relief available
01:07:78		Α.	No.	C1.C0.25		at the time	
01:07:18		Q.	In terms of "all high-risk inmates,"	01:39:29		A.	yes.
01:07:24		•	ferstand that to be somebody among the	7			
01:97:27			t somebody who scores eight or higher	91:29:29			And that was gone over at each of
01:97:29			cide Prevention Screening Form?	01:09:33		_ '	g sessions that you've attended?
G1:07:31		Α.	Yes. Yes.	04:09:35		Α.	Yes.
05:07:41		Q.	Would it surprise you if I told you	01:09:39 -		ď.	Do you know if there's any policies
01:07:40			was testimony in this case that	Q1 08/38		•	res at Putnam County Correctional
01:07:44	24		were unaware of Commission of	01:02:59			t take into consideration the fact
01.07:47	25		regulations requiring constant	01:03:40	25		duals who are withdrawing can
_			COMPU-TRAN SHORTHAND REPORTING	<u> </u>	<u> </u>	(	COMPU-TRAN SHORTHAND REPORTING
			74				76
	1		Robert LeFever	į	1		Robert LeFever
01:07:49	2	supervisio	rt =	01:50:43	2		resort to suicide, due to the mental
04:07:48	3	Α.	No.	36:30:47	3		al pain of that withdrawal?
01.07:50	4	Q.	for all high-risk inmates?	0::02:55	4	Α.	No.
01007551	5	Α.	No.	āt:a\$:55	5		So, other than the verbal training,
01:07:52	6		MR. RANDAZZO: Objection to	01.03-52	6	-	vare of anything that provides any
01:07:52	7	the :	orm.	01.0254	7	•	o correction officers or sergeants, for
01:07:52	8	Q.	Why wouldn't that surprise you?	016956	8	those who	are going through withdrawal?
u1:57:54	9		MR. RANDAZZO: Objection to	01:10:21	ā	A.	No.
01:07:54	10	the t	form.	G1:10:07	10		MR. KLEINBERG: Can we take
01:07:55	11	A.	It's not trained that way.	01:50:09	11	a bre	eak?
01:07.58	12	Q.	How is it trained?	01:10:10	12		MS. BERG: You want to take
q1. <b>07</b> :57	13	A.	It's trained that it's a subjective	01:10:11	13	a bre	eak? Sure.
91.05.00		evaluatio		01.10.10	14		(Recess held)
å1 ¢6:00		Q.	So, what does that mean?	01:23:37	15		MR. RANDAZZO: He just
01:08:21		A.	It you can put somebody on	07:22/37	16	want	ted to clarify something from something
01:50:05			watch for one for a score of two or	01:22:39		earli	
01:50:05		three.		01:23:32		CONTINUE	ED EXAMINATION BY MS, BERG:
G1:08:10		Q.	But if the score is eight or higher,	01:23:40		Q.	Go ahead.
G1:08:15			I that they must be placed on a	012340		A.	Earlier, you asked if there were
01:08:15		constant v	•	G12542			ns about changing the form, Suicide
	22	A.	Yes.	012345			g Prevention form.
	7	Q.	You're sure of that?	0123345		Q.	Yes.
01:us. iu		<b>Q</b> .	MR. RANDAZZO: Objection to	01:23:46		Α.	Yes, there was discussion recently
01:08:25		4h	form.	1			riff Smith, and the discussion ended
D1:08:22	25			VF 227:48	20		COMPU-TRAN SHORTHAND REPORTING
1			COMPU-TRAN SHORTHAND REPORTING	1		,	OOMED WAN SHOW HINNO VECALING

	1	Case 7:07-cv-02866-CS-GAY <sup>7</sup> Docun	nent 23-1	7 Filed 05/07/2008 Page 8 of 13 <sup>79</sup>
31.53:52	2	we decided to do away with ouounty form and go	012520 2	forms?
91/20:59	3	with the state form.	01:25:21 3	A. No.
02.5	4	Q. And when was that?	012501 4	Q. Prior to your recent discussion with
],	5	A. Within the last month.	01:25:35 5	Sheriff Smith in the last month or so, did you
C1:24:00	6	Q. Who else was involved in that	ot 25:43 - <b>6</b>	ever have any communications with anybody as to
61:24-02	7	discussion, if anyone?	51:25:46 <b>7</b>	why there was no written policy or procedure
01:24:03	8	A. No one else, I believe.	5::25:48 8	that, with respect to a score of eight or higher,
01.2496	9	Q. And since that discussion, has the	p::2655 '9	constant watch is automatic?
31:24:10	-	form actually been changed?	D1:20:04 10	A. No.
01:24:12		A. We use the state form now, yes.	01:29:55 11	Q. In other words, in all of the years
01:24:14		Q. And when was the first time that the	012556 12	of training that you've attended where that's
01:24:14		state form was used?	61 2550 13	been verbally told to you, as you say, did you
01:24:05		A. About a month ago.	organ 14	ever point out to anyone, as the jail
01:24:01 01:24:18		Q. And do you recall who first proposed	01,78:1 15	administrator or otherwise, that there was
1		changing the form?	21:20:07 16	nothing in writing in Putnam County that provided
01/24/21			31:25:09 17	that?
01:24:32		A. No, I don't.	D1:2009 18	. A. No.
01:24:53		Q. How was it that you became involved	01:25:10	Q. Whose responsibility would it be to
01:24:35		In the discussions?	c1.25:53 20	implement policies or procedures that are
01;24:97		A. As the jail administrator.		consistent with the state standards?
91-24:28		Q. In other words, did Smith call you	c1:26:15 21	MR. RANDAZZO: Objection to
012490		in and suggest it to you? Did you suggest it to	01/29:17 22	<b> </b>
01:24:43	23	Smith? You know, something else?	on (20:13 23	the form.
01:24:44	24	A. I think it was just in a discussion,	05:29:10 24	MR. KLEINBERG: Objection.
01:24:45	25	mutual discussion on the topic.	01:29:21 <b>25</b>	A. Sheriff Smith.
L		COMPU-TRAN SHORTHAND REPORTING	<del></del>	COMPU-TRAN SHORTHAND REPORTING
į		78		80
<u>[</u>	1	Robert LeFever	1	Robert LeFever
01:24:48	1 2	Robert LeFever  Q. And do you recall if anything more	1 012522 2	Robert LeFever  Q. Or the prior sheriff?
01:24:48	1 2 3	Robert LeFever	•	Robert LeFever Q. Or the prior sheriff? A. Or the prior sheriff. The sheriff,
	1 2 3 4	Robert LeFever  Q. And do you recall if anything more	012622 2	Robert LeFever Q. Or the prior sheriff? A. Or the prior sheriff. The sheriff, the sitting sheriff.
01:24:50	2	Robert LeFever Q. And do you recall if anything more specific was sald, other than, you're going to go	01:26:22 2 21:26:24 3	Robert LeFever Q. Or the prior sheriff? A. Or the prior sheriff. The sheriff, the sitting sheriff. Q. In terms of the ADM 330 and the
01:24:50 01:24:52	3	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?	01:26:22 2 01:26:24 3 01:20:25 4	Robert LeFever Q. Or the prior sheriff? A. Or the prior sheriff. The sheriff, the sitting sheriff. Q. In terms of the ADM 330 and the county form again, prior to the state form
01:24:50 01:24:52 91:24:53	3	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.	01:25:22 2 01:25:24 3 01:20:25 4 01:20:20 5	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you
01:24:50 01:24:52 01:24:53 01:24:54	3	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?	01:26:22 2 5:26:24 3 01:26:25 4 01:26:20 5	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you
01:24:50 01:24:52 01:24:53 01:24:54 01:24:55	2 3 4 5 6 7	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.	01:26:22 2 2:26:26:24 3 01:26:25 4 01:26:30 5 01:25:37 6 01:25:37 6	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input
01:24:50 01:24:52 01:24:53 01:24:54 01:24:55 01:24:55	2 3 4 5 6 7 8 9	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?	012622 2 2222 3 012624 3 012625 4 012620 5 012527 6 012620 7	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?
01:24:50 01:24:52 01:24:53 01:24:54 01:24:55 01:24:55	2 3 4 5 6 7 8 9	Robert LeFever Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form? A. No. Q. Was any reason given? A. Just to use the state form. Q. Was any reason given, though? A. Just to make it easier, I guess;	012622 2 212624 3 012625 4 012620 5 012527 6 012527 7 -012642 8	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in
01:24:50 01:24:52 01:24:53 01:24:54 01:24:55 01:24:55 01:24:55 01:25:01	2 3 4 5 6 7 8 9 10	Robert LeFever Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form? A. No. Q. Was any reason given? A. Just to use the state form. Q. Was any reason given, though? A. Just to make it easier, I guess; simplify it.	012622 2 012624 3 012625 4 012620 5 012527 6 012532 8 012632 8 012634 9	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in
01:24:50 01:24:52 01:24:53 01:24:54 01:24:52 01:24:52 01:25:02 01:25:02	2 3 4 5 6 7 8 9 10 11 12	Robert LeFever Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form? A. No. Q. Was any reason given? A. Just to use the state form. Q. Was any reason given, though? A. Just to make it easier, I guess; simplify it. Q. Do you know what, if anything,	012622 2 012624 3 012625 4 012630 5 012537 6 012537 8 012532 8 012632 8	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in
01:24:50 01:24:52 01:24:54 01:24:54 01:24:55 01:24:55 01:25:07 01:25:05 01:25:05	2 3 4 5 6 7 8 9 10 11 12 13	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?	012622 2 212624 3 012625 4 012620 5 012527 6 012640 7 012640 9 112644 10 512649 11 012652 12	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?
01:24:50 01:24:52 01:24:53 01:24:54 01:24:54 01:24:55 01:25:02 01:25:02	2 3 4 5 6 7 8 9 10 11 12 13 14	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.	012622 2 012624 3 012625 4 012630 5 012537 6 012530 7 012532 8 012542 10 012645 10 012645 11	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of licutenant?  A. The administrative sergeant, yes.
01:24:50 01:24:52 01:24:53 01:24:54 01:24:54 01:25:05 01:25:05 01:25:05 01:25:05	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.	012622 2 012624 3 012625 4 012630 5 012537 6 012530 7 012532 8 012532 10 012632 11 012632 11 012632 12	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into dracting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at
01:24:50 01:24:52 01:24:52 01:24:52 01:24:52 01:24:52 01:25:02 01:25:03 01:25:13 01:25:13	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1,	012622 2 012624 3 012625 4 012630 5 012630 6 012630 7 012632 8 012632 11 012632 11 012632 11 012632 12 012633 14	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?
01:24:50 01:24:52 01:24:53 01:24:54 01:24:54 01:25:02 01:25:02 01:25:03 01:25:03 01:25:17 01:25:17	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.	0148622 2 214624 3 012025 4 012030 5 012537 6 012540 7 012640 9 142646 9 142646 10 142646 11 142646 12 142646 13 142646 14	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into dracting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?  A. Correct.
01:24:50 01:24:52 01:24:54 01:24:54 01:24:54 01:24:55 01:25:02 01:25:03 01:25:05 01:25:15 01:25:17 01:25:17	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the	012622 2 012624 3 012625 4 012630 5 012537 6 012530 7 012530 8 012530 10 012530 11 012630 11 012630 12 012630 13 012630 14 012631 14 012631 15 012730 16	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes. Q. Because there was no lieutenant at the time?  A. Correct. Q. And so, who did you report to then?
01:24:50 01:24:52 01:24:53 01:24:54 01:24:52 01:24:52 01:25:07 01:25:07 01:25:07 01:25:17 01:25:17 01:25:17 01:25:17	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?	01.26.22 2 01.26.24 3 01.26.25 4 01.26.20 5 01.25.27 6 01.25.20 7 01.25.21 8 01.25.22 8 01.25.22 8 01.25.22 10 01.26.25 11 01.26.25 12 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14 01.26.25 14	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of licutenant?  A. The administrative sergeant, yes.  Q. Because there was no licutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?
01:24:50 01:24:52 01:24:53 01:24:54 01:24:54 01:25:02 01:25:03 01:25:03 01:25:03 01:25:03 01:25:03 01:25:03 01:25:03 01:25:03	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?  A. Yes.	012622 2 012624 3 012625 4 012630 5 012630 6 012630 7 012632 8 012632 11 012632 12 012632 12 012632 12 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into dracting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?  A. Yes.
01:24:50 01:24:52 01:24:53 01:24:54 01:24:52 01:24:52 01:25:07 01:25:07 01:25:07 01:25:17 01:25:17 01:25:17 01:25:17	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?  A. Yes.  Q. And has that been true since the	012622 2 012624 3 012625 4 012630 5 012530 6 012630 7 012632 8 012632 10 012632 11 012632 12 012634 13 012635 14 012635 14 012635 14 012635 15 012700 16 012700 18 012700 18	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into dracting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?  A. Yes.  Q. Was that Butler?
01:24:50 01:24:52 01:24:52 01:24:52 01:24:52 01:24:52 01:25:05 01:25:05 01:25:15 01:25:17 01:25:27 01:25:27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?  A. Yes.  Q. And has that been true since the state form has been used?	0148622 2 2012824 3 012825 4 012830 5 012830 7 012840 7 012840 10 2012840 10 2012840 11 012840 11 012840 14 012841 13 012841 14 012841 14 012841 15 012740 16 012740 18 012740 18 012740 19 012740 21	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?  A. Yes.  Q. Was that Butler?  A. Yes.
01:24:50 01:24:52 01:24:54 01:24:54 01:24:55 01:24:55 01:25:02 01:25:05 01:25:05 01:25:17 01:25:21 01:25:22 01:25:22	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?  A. Yes.  Q. And has that been true since the state form has been used?  A. Yes.	012622 2 012624 3 012625 4 012630 5 012537 6 012530 7 012532 8 012532 10 012632 11 012632 12 012632 12 012632 13 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 12 012730 16 012730 18 012730 19 012730 20 012750 21	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of licutenant?  A. The administrative sergeant, yes.  Q. Because there was no licutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?  A. Yes.  Q. Was that Butler?  A. Yes.  Q. And who was the undersheriff?
01:24:50 01:24:52 01:24:53 01:24:54 01:24:54 01:24:54 01:25:07 01:25:05 01:25:05 01:25:07 01:25:07 01:25:07 01:25:20 01:25:20 01:25:20 01:25:20 01:25:20 01:25:20 01:25:20	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?  A. Yes.  Q. And has that been true since the state form has been used?  A. Yes.  Q. Prior to that time, were	012622 2 012624 3 012624 4 012630 5 012630 6 012630 7 012632 8 012632 10 012632 11 012632 12 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 17 012632 17 012632 20 012733 20 012733 20 012733 24	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?  A. Yes.  Q. Was that Butler?  A. Yes.  Q. And who was the undersheriff?  A. Phil Prinz.
01:24:50 01:24:52 01:24:54 01:24:54 01:24:55 01:24:55 01:25:02 01:25:05 01:25:05 01:25:17 01:25:21 01:25:22 01:25:22	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robert LeFever  Q. And do you recall if anything more specific was sald, other than, you're going to go with the state form?  A. No.  Q. Was any reason given?  A. Just to use the state form.  Q. Was any reason given, though?  A. Just to make it easier, I guess; simplify it.  Q. Do you know what, if anything, prompted that discussion?  A. No.  Q. Part of the state form, Exhibit 1, has an Instruction Sheet.  Have you ever seen that?  A. Yes.  Q. Is that also provided to the correction officers?  A. Yes.  Q. And has that been true since the state form has been used?  A. Yes.  Q. Prior to that time, were	012622 2 012624 3 012625 4 012630 5 012537 6 012530 7 012532 8 012532 10 012632 11 012632 12 012632 12 012632 13 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 14 012632 12 012730 16 012730 18 012730 19 012730 20 012750 21	Robert LeFever  Q. Or the prior sheriff?  A. Or the prior sheriff. The sheriff, the sitting sheriff.  Q. In terms of the ADM 330 and the county form again, prior to the state form coming into the facility about a month ago you indicated back in 1988 or so, you did have input into drafting the SOJ 32?  A. Yes.  Q. And do you recall at that point in time you were a sergeant, but you were acting in the role of lieutenant?  A. The administrative sergeant, yes.  Q. Because there was no lieutenant at the time?  A. Correct.  Q. And so, who did you report to then? The captain?  A. Yes.  Q. Was that Butler?  A. Yes.  Q. And who was the undersheriff?  A. Phil Prinz.

	1	Case 7:07-cv-02866-CS-GAY <b>¹</b> 0ocume Robert LeFeve	nt 23-17 <b>1</b>	Filed 05/07/2008 Page 9 of 13 <sup>83</sup> Robert LeFever
D1 27:14	2	A. Thoubboron	D1:25:51 <b>2</b>	Q. Do you recall?
	~	Q. And do you recall having any	ot:28:62 <b>3</b>	A. No.
01:27:17	4	discussion with Butler, Prinz, and Thoubboron, or	01:25:52 4	Q. Did you bring anybody in the
D1		any of them, about modifying the state form?	_	administration, either undersheriff or sheriff,
0.	5	•	_	up to speed on how the workings of the jail at
01.27:24	6	_	_	that time and since that time have operated?
01.27.25	1	Q. Do you recall if anybody higher than	01:2201 7	A. Yes.
Q1.27:28	8	you in the chain of command approved the use of	01-200+ 8	
01:27:31	9	the SOJ 32?	01-29.05 9	Q. Did you do that on a regular basis?
0127:57 1		A. I don't remember. I would imagine	012907 <b>10</b>	A. Periodic.
01:27:34 1		so, yes.	012928 11	Q. And during any of those updates or
01:27:35 1	12	Q. And would you at that time, as	01.25:12 12	bringing them up to speed, did anything about
c1:27:a7 1	13	administrative sergeant, have the authority to	012904 13	suicide prevention come up?
C1:27:39	14	put the form in place?	0129:15 14	A. No.
01:27:40 1	15	A. No.	01/29:15 15	Q. Since Smith took office, there have
05:27:40 1	16	${f Q}_{*}$ Do you recall who, then $\sim$ either	01:29:19 16	been two suicides in the fail; correct?
92:27:42 1	17	Captain Butler, Undersheriff Prinz, or Sheriff	012925 17	A, Yes.
]   01:27:45	18	Thoubboron approved the use of that form?	ოლი 18	Q. One was Rivera, and one was Sinkov?
01.27:45	19	A. Don't remember.	on 000 04 19	A. Yes.
0127%6 2	20	Q. Do you recall who first suggested	arzs:25 20	Q. And there was also an attempted
01.27.51	21	modifying the form to remove the part about	01:28:27 <b>21</b>	suicide; correct?
U1 27:53 2	22	implementing constant watch?	ət:2927 <b>22</b>	A. Yes.
0127:\$8 2	23	A. No, I don't remember.	ot:29:28 <b>23</b>	Q. By a man named Rodriguez?
01:27:57 Å		Q. Did you have any discussions with	D1:29:21 <b>24</b>	A. Yes.
01:27:55		anybody as to why the form was changed in that	01.29.32 25	Q. Any other attempted suicides since
		COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
<b>├</b> -		82		84
}	1	Robert LeFever	1	Robert LeFever
61:28 C1	•		l	•
	2	way?	c12824 <b>2</b>	Smith took office?
į	2	way?  A. Don't remember.		Smith took office?  A. No.
63,28,01	2 3 4	A. Don't remember.	c12926 3	A. No.
05:25:01 01:26:02	3	<ul><li>A. Don't remember.</li><li>Q. Do you recall any discussions at</li></ul>	c12925 3 c12935 4	<ul><li>A. No.</li><li>Q. In connection with any of the</li></ul>
01:28:04 01:28:02 01:28:24	2 3 4 5	<ul> <li>A. Don't remember.</li> <li>Q. Do you recall any discussions at that time about cost saving?</li> </ul>	c12925 3 c12925 4 c12925 5	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you
01:28:04 01:28:02 01:28:24 01:28:11	3	<ul> <li>A. Don't remember.</li> <li>Q. Do you recall any discussions at that time about cost saving?</li> <li>A. No.</li> </ul>	012836 3 012836 4 012836 5 012836 6	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery
05.2524 01.2642 01.26;24 01.26;11	3 4 5 6 7	<ul> <li>A. Don't remember.</li> <li>Q. Do you retall any discussions at that time about cost saving?</li> <li>A. No.</li> <li>Q. When Sheriff Smith took office in</li> </ul>	012935 3 012935 4 012935 5 012935 6 012931 7	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or
01:25:04 01:26:04 01:26:04 01:26:11 01:26:11	3 4 5 6 7 8	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have	012835 3 012835 4 012835 5 012835 6 012841 7 012845 8	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures?
61.25.04 91.26.04 91.26.04 91.26.11 91.26.11 91.26.15	3 4 5 6 7 8 9	<ul> <li>A. Don't remember.</li> <li>Q. Do you recall any discussions at that time about cost saving?</li> <li>A. No.</li> <li>Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the</li> </ul>	012805 3 012806 4 012806 5 012806 6 012806 7 012806 8 513805 9	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No.
01:28:04 01:28:04 01:28:04 01:28:11 01:28:11 01:28:15 01:28:25	3 4 5 6 7 8 9	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies?	012805 3 012808 4 012806 5 012806 6 012806 7 012806 8 502806 9 502806 10	<ul> <li>A. No.</li> <li>Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures?</li> <li>A. No.</li> <li>Q. Did you have any conversations with</li> </ul>
01:28:04 01:28:04 01:28:11 01:20:15 01:20:15 01:20:22 01:22:22	3 4 5 6 7 8 9 10	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No.	012805 3 012806 4 012806 5 012806 6 012801 7 012806 8 012806 8 012806 9 012806 10	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms?
01.28.04 01.28.04 01.28.04 01.28.11 01.20.15 01.22.22 01.22.22	3 4 5 6 7 8 9 10 11	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with	012805 3 012806 4 012806 5 012806 6 012806 7 012806 8 555805 9 552806 10 012806 11	<ul> <li>A. No.</li> <li>Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures?</li> <li>A. No.</li> <li>Q. Did you have any conversations with them about the suicide screening forms?</li> <li>A. No.</li> </ul>
01:28:04 01:28:04 01:28:04 01:28:11 01:20:15 01:23:15 01:22:22 01:22:22 01:22:22	3 4 5 6 7 8 9 10 11 12	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about other than the one a month ago	012805 3 012805 4 012805 5 012805 6 012805 7 012805 8 012805 9 012805 10 012805 11 012805 11	<ul> <li>A. No.</li> <li>Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures?</li> <li>A. No.</li> <li>Q. Did you have any conversations with them about the suicide screening forms?</li> <li>A. No.</li> <li>Q. Did they ask you any questions at</li> </ul>
01:28:04 01:28:04 01:28:11 01:20:15 01:23:15 01:23:20 01:22:22 01:22:24 01:22:24	3 4 5 6 7 8 9 10 11 12 13	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different?	012805 3 012805 4 012805 5 012805 6 012805 7 012805 8 012805 9 012805 10 012805 11 012805 12 012805 12	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or
01:28:04 01:28:04 01:28:04 01:28:11 01:28:15 01:28:15 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29	3 4 5 6 7 8 9 10 11 12 13 14	A. Don't remember. Q. Do you retall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No.	012805 3 012805 4 012805 5 012805 6 012805 7 012805 8 5.0005 9 012805 10 012805 11 012805 12 012805 15	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide
01:28:04 01:28:04 01:28:11 01:20:15 01:23:15 01:23:20 01:22:22 01:22:24 01:22:24	3 4 5 6 7 8 9 10 11 12 13 14	A. Don't remember. Q. Do you retall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions,	012808 3 012808 4 012808 5 012808 6 012808 7 012808 8 012808 10 012808 11 012808 11 012808 12 012808 15	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again?
01.28.04 01.28.24 01.28.21 01.20.15 01.20.15 01.22.22 01.22.22 01.22.22 01.22.22 01.22.23 01.23.23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff,	012935 3 012935 4 012935 6 012935 6 012935 8 512935 9 012935 10 012935 12 012935 15 012935 15 012935 15 012935 16 013932 17	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No.
01.28.04 01.28.04 01.28.01 01.28.11 01.20.15 01.23.20 01.22.22 01.22.22 01.22.22 01.22.24 01.23.23 01.23.23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Don't remember. Q. Do you retall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in	012805 3 012805 4 012805 6 012805 6 012805 7 012805 8 502805 9 012805 10 012805 11 012805 15 012805 15 012805 15 012805 15	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is
01.28.04 01.28.24 01.28.21 01.20.15 01.20.15 01.22.22 01.22.22 01.22.22 01.22.22 01.22.23 01.23.23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff,	012805 3 012805 4 012805 5 012805 6 012805 8 012805 9 012805 10 012805 11 012805 12 012805 15 012805 15 012805 15 012805 15 012805 15 012805 17 012805 17 012805 17	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual?
01:28:04 01:28:04 01:28:04 01:28:11 01:28:15 01:28:15 01:28:25 01:28:22 01:28:22 01:28:22 01:28:23 01:28:23 01:28:23 01:28:23 01:28:23 01:28:23 01:28:23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail? A. No.	012805 3 012805 4 012805 5 012805 6 012805 6 012805 7 012805 8 012805 10 012805 11 012805 12 012805 15 012805 15 012805 15 012805 15 012805 15 012805 16 012003 17 012003 18 012003 20	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes.
01:28:09 01:28:09 01:28:11 01:28:15 01:28:15 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:29 01:28:28 01:28:28	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about other than the one a month ago about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail?	012805 3 012805 4 012805 5 012805 6 012805 8 012805 9 012805 10 012805 11 012805 12 012805 15 012805 15 012805 15 012805 15 012805 15 012805 17 012805 17 012805 17	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes. Q. Under what circumstances?
01:28:04 01:28:04 01:28:04 01:28:11 01:28:15 01:28:15 01:28:25 01:28:22 01:28:22 01:28:23 01:28:24 01:28:26 01:25:33 01:25:33 01:25:33 01:25:35	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail? A. No.	012805 3 012805 4 012805 5 012805 6 012805 6 012805 7 012805 8 012805 10 012805 11 012805 12 012805 15 012805 15 012805 15 012805 15 012805 15 012805 16 012003 17 012003 18 012003 20	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes.
01:28:01 01:28:02 01:28:04 01:28:11 01:28:15 01:28:15 01:28:25 01:28:22 01:28:22 01:28:22 01:28:23 01:28:23 01:28:23 01:28:23 01:28:23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	A. Don't remember. Q. Do you retall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail? A. No. Q. When Sheriff Smith took office, did	012805 3 012805 4 012805 6 012805 6 012805 8 012805 9 012805 11 012805 12 012805 15 012805 15 012805 15 012805 15 012805 16 012805 17 012805 17 012805 18 012805 19 012805 27	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes. Q. Under what circumstances?
01:28:04 01:28:04 01:28:11 01:28:15 01:28:15 01:28:25 01:28:22 01:28:22 01:28:22 01:28:23 01:28:23 01:28:23 01:25:23 01:25:23 01:25:23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail? A. No. Q. When Sheriff Smith took office, did anybody in his administration, including him,	012805 3 012805 4 012805 5 012805 6 012805 8 012805 8 012805 10 012805 11 012805 12 012805 15 012805 15 012805 15 012805 15 012805 15 012805 16 012805 17 012805 17 012805 27 012805 27	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes. Q. Under what circumstances? A. Yesterday, with counsel.
01:28:04 01:28:04 01:28:04 01:28:11 01:28:15 01:28:15 01:28:29 01:22:22 01:22:22 01:22:22 01:22:23 01:22:24 01:22:23 01:22:24 01:25:23 01:25:23 01:25:23 01:25:23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 22 23 24	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail? A. No. Q. When Sheriff Smith took office, did anybody in his administration, including him, ever conduct any review of jail policies or	012935 3 012935 4 012935 6 012935 6 012935 7 012935 9 012935 10 012935 12 012935 15 012935 15 012935 16 012935 16 012935 16 012935 16 012935 16 012935 16 012935 20 013032 21 013032 22	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes. Q. Under what circumstances? A. Yesterday, with counsel. Q. Prior to that, had you ever seen it?
01.28.04 01.28.04 01.28.11 01.20.15 01.20.15 01.20.25 01.22.22 01.22.22 01.22.22 01.22.23 01.22.23 01.25.23 01.25.23 01.25.23 01.25.23	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 22 23 24	A. Don't remember. Q. Do you recall any discussions at that time about cost saving? A. No. Q. When Sheriff Smith took office in about January of 2002 and since that time, have you had any discussions with him about any of the suicide-prevention procedures or policies? A. No. Q. Have you had any discussions with him about — other than the one a month ago — about the form being different? A. No. Q. Has he ever asked you any questions, either through him or through his undersheriff, about what procedures or policies are in place in the jail? A. No. Q. When Sheriff Smith took office, did anybody in his administration, including him, ever conduct any review of jail policies or procedures?	012805 3 012805 4 012805 6 012805 6 012805 7 012805 8 5.0025 9 012805 10 012805 11 012805 15 012805 15 012805 15 012805 16 012805 16 012805 16 012805 17 012805 16 012805 20 013805 21 013805 22 013805 24	A. No. Q. In connection with any of the attempted or actual suicides in the jail, did you have any conversations with Undersheriff Convery or Sheriff Smith about the jail's policies or procedures? A. No. Q. Did you have any conversations with them about the suicide screening forms? A. No. Q. Did they ask you any questions at any point in time about what methods or procedures are in place to ensure that a suicide didn't happen or an attempt didn't happen again? A. No. Q. Did you ever see Exhibit 8, which is the Trainer's Manual? A. Yes. Q. Under what circumstances? A. Yesterday, with counsel. Q. Prior to that, had you ever seen it? A. No.

	Case 7:07-cv-02866-CS-GAY Docum	nt 23-17	7 Filed 05/07/2008 Page 10 of 13
1		01:32:54 2	Do you see that?
01:20:22 2	sheet it has some handwritten nocons.		A. Yes.
01:20:30	Do you recognize the handwriting?		Q. Do you know what that project is?
o .4	A. No.	_	A. No.
a, <sup>2</sup> 5	Q. Do you know if anybody in the Putnam	pr-9257 <b>5</b>	
01:30.49 6	County Correctional Facility has ever received a	07:02.56 <b>6</b>	
01:50:52 7	copy of Exhibit 8, the Training Manual?	01:02:≓9 <b>/</b>	A. No.
0:-99.54	A. Yes.	01:02:#9 8	Q. Did anybody ever indicate to you
ştinû:54 <b>9</b>	Q. Those would be the individuals you	01:23:01 9	that the form, the ADM 330, Is part of that
o1:00;5e 10	listed earlier?	01:33:06 10	project?
D1:20:57 11	A. Yes.	e1:32:05 11	A. No.
01:30:55 12	Q. And did you distribute the Training	01:23:06 12	Q. Or that that project was something
01:30:59 13	Manual to them?	91:32/05 <b>13</b>	that came into place through the State Commission
et:21500 <b>14</b>	A. No.	01:03:13 14	after its collaborative efforts with local
or:ation 15	Q. Do you know how they got it?	01:03:18 15	sheriffs?
91 3150 <b>16</b>	A. No.	01900Y 16	A. No.
un.81:03 <b>17</b>	Q. On the first page I'm sorry;	01:23:10 17	Q. Did you ever come to learn that the
gracet3 <b>18</b>	second page, small "if" at the bottom: "Message	01:33:20 18	training that's given at Putnam County
61:21:19 <b>19</b>	to the trainer," in bold: "Prior to training, it	ot:33:22 19	Correctional Facility is part of that project?
GI:3124 20	is essential that local mental health and police/	51:53.25 20	A. No.
ot:a127 21	correctional officials draft coordinated suicide	a1 \$3/25 <b>21</b>	Q. Turn towards the back, if you would,
91.31:23 22	prevention procedures." Continuing down on that	p1:35% <b>22</b>	Roman numeral VI-11. It refer to, at the top,
01:91:36 <b>23</b>	same paragraph, "We cannot over-emphasize the	B1 2329 23	"Action to the taken by supervisor: Constant
012132 24	importance of developing procedures; the program	01:34:00 24	(one-to-one) is the only acceptable level for
01:31:43 25	cannot succeed unless staff knows what to do with	01:54:07 25	supervision watch in New York State."
01:31:03 23	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
I			
ļ <u>-</u>			88
1	86	1	· · · · · · · · · · · · · · · · · · ·
1	86 Robert LeFever	1 012459 2	88
0131946 2	86  Robert LeFever an Identified high-risk Inmate."	01:24:59 2	88 Robert LeFever
01.31946 2	86 Robert LeFever an Identified high-risk Inmate." Did any Instructor ever bring to	01:2459 2 01:24:24 3	88  Robert LeFever  Do you see that?  A. Yes.
013196 <b>2</b> 013197 <b>3</b> 013197 <b>4</b>	86  Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the	01:3458 2 01:3458 3 01:3458 4	88  Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the
013196 2 013197 3 012190 4 012190 5	86  Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures	012458 2 012458 3 013436 4 013431 5	88  Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the  Instructor's note: "See New York State
01:31:46 2 01:31:47 3 01:31:47 4 01:31:51 5 01:31:53 6	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to  your attention anything about the fact that the  Putnam County Correctional Facility procedures and policies did not have anything about constant	01:24:28 2 01:24:28 3 01:24:28 4 01:24:15 5 01:24:15 6	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the  Instructor's note: "See New York State  Commission of Correction Chairman's Memorandum
01.31% 2 01.31% 3 01.25% 4 01.25% 5 01.31% 6 01.31% 7	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk	012408 2 012408 3 040408 4 040405 6 040405 6	Robert LeFever  Do you see that?  A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."
013146 2 013147 3 012040 4 013151 5 013153 6 013167 7	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to  your attention anything about the fact that the  Putnam County Correctional Facility procedures  and policies did not have anything about constant  watch being automatic in the case of a high-risk inmate?	012458 2 012408 3 040408 4 043401 5 043401 6 043401 7 042421 8	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the  Instructor's note: "See New York State  Commission of Correction Chalrman's Memorandum  Number 17.99, November 1, 1999."  Do you recall if anybody, as part of
013146 2 013147 3 012140 4 013151 5 013153 6 013167 7 013168 8 013169 9	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR: KLEINBERG: Objection.	012428 2 012428 3 043428 4 043421 5 043421 6 013421 7 012421 8 012422 9	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?
013146 2 013147 3 012040 4 013151 5 013153 6 013157 7 203158 7 203158 9 013230 10	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.	012408 2 012408 3 013408 4 013401 5 013401 6 013401 7 012421 8 012422 9 013424 10	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the  Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.
013196 2 013197 3 01449 4 013191 5 013197 7 013197 7 013199 9 013200 10 013200 11	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever dld you ever	012458 2 012458 3 013458 4 013451 5 013451 6 013458 7 012421 8 012422 9 013424 10	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?
013196 2 013197 3 01449 4 013151 5 013151 7 013151 7 013151 9 013230 10 013230 11 013230 12	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR: KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?	013458 2 013458 4 013451 5 013451 6 013451 7 013421 8 013422 9 013424 10 013428 11	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out.
013146 2 013147 3 013340 4 013351 5 013151 7 213152 8 013135 9 013230 10 013230 11 013202 12 013202 12	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.	012408 2 012408 3 043408 4 043401 5 043401 6 043401 7 042421 8 042422 9 043424 10 043428 11 043428 12	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out.  Q. And do you recall if it was
013196 2 013197 3 013390 4 013197 5 013197 7 013197 7 013190 10 013200 10 013200 11 013202 12 013206 13 013206 13	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions	012458 2 012428 4 013421 5 013421 6 013421 7 012421 8 012422 9 012422 9 012424 10 013428 11 013428 12 013428 12	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum?
013496 2 013497 3 013490 4 013151 5 013151 7 013159 7 013150 10 013200 10 013200 11 013202 12 013204 13 013204 14 013216 15	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR: KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the	012408 2 012408 3 013408 4 013401 5 013401 6 012421 8 012421 8 012422 9 013424 10 013428 12 013428 12 013428 12	Robert LeFever Do you see that?  A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the
013446 2 013447 3 013340 4 013340 5 013157 7 013158 7 013230 10 013230 10 013230 11 013202 12 013203 13 013203 14 013203 15 013203 15	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?	012408 2 012408 3 043408 4 043401 5 043401 6 043401 7 042421 8 042422 9 043424 10 043424 10 043424 12 043424 12 043424 13 043424 15	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum?  A. They were reaffirming the Commission's standard that a 15-minute watch or
013196 2 013197 3 013199 4 013191 5 013197 7 013199 8 013230 10 013230 11 013230 11 013230 12 013230 13 013230 14 013230 15 013230 16 013230 16	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINSERG: Objection.  A. No.  Q. Did anybody ever dld you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form.	012458 2 012458 3 013458 4 013451 5 013458 7 012421 8 012422 9 012422 9 012422 10 013428 11 013428 12 013428 13 013438 16 013438 16	Robert LeFever Do you see that? A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum? A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for
013446 2 013447 3 013340 4 013340 5 013157 7 013158 7 013230 10 013230 10 013230 11 013202 12 013203 13 013203 14 013203 15 013203 15	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINSERG: Objection.  A. No.  Q. Did anybody ever dld you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form.	013458 2 013458 4 013451 5 013451 6 013451 7 013421 8 013422 9 013424 10 013424 11 013424 12 013424 13 013424 15 013424 15 013424 16	Robert LeFever Do you see that? A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum? A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk.
013196 2 013197 3 013199 4 013191 5 013197 7 013199 8 013230 10 013230 11 013230 11 013230 12 013230 13 013230 14 013230 15 013230 16 013230 16	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR: KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form.  Q. Other than the form, itself?  A. No.	012408 2 012408 3 040408 4 040408 6 040408 7 040408 7 040408 10 040408 11 040408 15 040408 16 040408 17 040408 18 040408 18	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out.  Q. And do you recall if it was explained what was contained in that memorandum?  A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk.  Q. And reaffirming the Commission's
013496 2 013497 3 013490 4 013151 5 013151 7 013152 8 013151 7 013200 10 013200 11 013200 11 013200 12 013200 14 013200 14 013200 15 013200 17 013200 17 013200 17 013200 17	Robert LeFever  an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form.  Q. Other than the form, itself?  A. No.	012458 2 012458 3 013458 4 013451 5 013458 7 012421 8 012422 9 013424 10 013424 11 013424 12 013424 13 013425 16 013425 16 013425 16 013425 17 013443 18 013444 19 013444 19	Robert LeFever Do you see that? A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum? A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk. Q. And reaffirming the Commission's standard that constant watch is automatic in
013196 2 013197 3 013394 4 013191 5 013197 7 213198 8 013199 9 013230 10 013230 11 013202 12 013202 12 013203 14 013203 15 013203 16 013203 17 013223 18 013223 17	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINSERG: Objection.  A. No.  Q. Did anybody ever dld you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form. Q. Other than the form, itself? A. No. Q. If you take a look at Roman numeral	012408 2 012408 3 040408 4 040408 6 040408 7 040408 7 040408 10 040408 11 040408 15 040408 16 040408 17 040408 18 040408 18	Robert LeFever Do you see that?  A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk. Q. And reaffirming the Commission's standard that constant watch is automatic in cases where the person poses as a suicide risk?
013196 2 013197 3 013199 4 013197 5 013197 7 013199 8 013200 10 013200 11 013202 12 013206 13 013206 14 013206 16 013206 16 013207 17 013207 17 013207 18 013207 19	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form.  Q. Other than the form, itself?  A. No.  Q. If you take a look at Roman numeral I-3.	012408 2 012408 3 043408 4 043401 5 043401 6 043401 7 042421 8 042422 9 043424 10 043424 10 043424 12 043424 12 043424 13 043425 16 043426 16 043426 17 04343 18 043446 19 043446 19 043446 19	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out.  Q. And do you recall if it was explained what was contained in that memorandum?  A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk.  Q. And reaffirming the Commission's standard that constant watch is automatic in cases where the person poses as a suicide risk?  A. No.
013496 2 013497 3 013490 4 013191 5 013191 7 013199 8 013130 10 013200 11 013202 12 013202 12 013202 14 013202 17 013202 17 013202 17 013202 17 013202 17 013202 17 013202 17 013202 17 013202 18 013202 20 013242 21	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No.  Q. Did anybody ever did you ever bring that to anybody's attention?  A. No.  Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form.  Q. Other than the form, itself?  A. No.  Q. If you take a look at Roman numeral I-3.  A. (Witness complies)	013458 2 013458 4 013451 5 013451 6 013451 7 013421 8 013422 9 013424 10 013428 12 013428 12 013428 12 013428 13 013421 14 013430 15 013436 16 013430 17 013444 19 013444 19 013444 20 013447 21	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out.  Q. And do you recall if it was explained what was contained in that memorandum?  A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk.  Q. And reaffirming the Commission's standard that constant watch is automatic in cases where the person poses as a suicide risk?  A. No.
013496 2 013497 3 013494 4 013495 5 013197 7 213198 8 013230 10 013230 11 013202 12 013202 12 013203 14 013202 17 013202 17 013202 17 013202 18 013202 17 013202 19 013202 21	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No. Q. Did anybody ever dld you ever bring that to anybody's attention?  A. No. Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form. Q. Other than the form, itself?  A. No. Q. If you take a look at Roman numeral I-3.  A. (Witness complies) Q. It refers to "Forensic Sulcide	012408 2 012408 3 043408 4 043401 5 043401 6 043401 7 042421 8 042422 9 043424 10 043424 10 043424 12 043424 12 043424 13 043425 16 043426 16 043426 17 04343 18 043446 19 043446 19 043446 19	Robert LeFever Do you see that? A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum? A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk. Q. And reaffirming the Commission's standard that constant watch is automatic in cases where the person poses as a suicide risk? A. No. Q. It didn't confirm that? A. No.
013496 2 013497 3 013490 4 013491 5 013197 7 013197 7 013200 10 013200 11 013202 12 013206 13 043206 14 043206 16 043206 16 043206 16 043206 17 043206 18 043206 19 043206 19 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20 043206 20	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR. KLEINBERG: Objection.  A. No. Q. Did anybody ever did you ever bring that to anybody's attention?  A. No. Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form. Q. Other than the form, itself? A. No. Q. If you take a look at Roman numeral I-3.  A. (Witness complies) Q. It refers to "Forensic Suicide Prevention Crisis Service Project. 1986 to	012458 2 012458 3 013458 4 013458 6 013458 7 012421 8 012422 9 012424 10 013424 10 013424 12 013425 14 012420 15 013436 16 013430 17 013443 18 013444 19 013444 19 013445 20 013450 22 013500 23	Robert LeFever Do you see that? A. Yes. Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chairman's Memorandum Number 17.99, November 1, 1999." Do you recall if anybody, as part of your training, referred to that memorandum? A. Yes. Q. Was it given to you as a hand-out? A. I don't remember, as a hand-out. Q. And do you recall if it was explained what was contained in that memorandum? A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk. Q. And reaffirming the Commission's standard that constant watch is automatic in cases where the person poses as a suicide risk? A. No. Q. It didn't confirm that? A. No. Q. So, it just confirmed that the
013196 2 013197 3 013190 4 013191 5 013191 7 013199 8 013230 10 013230 11 013230 11 013230 12 013230 14 013230 15 013230 17 013230 17 013230 17 013230 17 013230 17 013232 17 013232 17 013232 17 013232 21 013234 24	Robert LeFever an Identified high-risk Inmate."  Did any Instructor ever bring to your attention anything about the fact that the Putnam County Correctional Facility procedures and policies did not have anything about constant watch being automatic in the case of a high-risk inmate?  MR: KLEINBERG: Objection.  A. No. Q. Did anybody ever did you ever bring that to anybody's attention?  A. No. Q. Did you ever have any discussions with Sheriff Smith about changing any of the procedures or policies?  A. Just regarding the form. Q. Other than the form, itself? A. No. Q. If you take a look at Roman numeral I-3.  A. (Witness complies) Q. It refers to "Forensic Suicide Prevention Crisis Service Project. 1986 to 2000."  COMPU-TRAN SHORTHAND REPORTING	013458 2 013458 4 013458 4 013451 5 013451 6 013451 7 013421 8 013422 9 013422 10 013422 11 013422 12 013422 13 013423 15 013423 15 013423 15 013423 17 013423 18 013434 19 013444 20 013444 21 013445 22 013445 23 013445 24	Robert LeFever  Do you see that?  A. Yes.  Q. In the right column, the Instructor's note: "See New York State Commission of Correction Chalrman's Memorandum Number 17.99, November 1, 1999."  Do you recall if anybody, as part of your training, referred to that memorandum?  A. Yes.  Q. Was it given to you as a hand-out?  A. I don't remember, as a hand-out.  Q. And do you recall if it was explained what was contained in that memorandum?  A. They were reaffirming the Commission's standard that a 15-minute watch or any other type of watch is not acceptable for suicide risk.  Q. And reaffirming the Commission's standard that constant watch is automatic in cases where the person poses as a suicide risk?  A. No.  Q. It didn't confirm that?  A. No.  Q. So, it just confirmed that the COMPU-TRAN SHORTHAND REPORTING

		Case 7:07-cv-02866-CS-GAY Socume	nt 23-	17	Filed 05/07/2008 _ Page 11 of 19
	1	Robert LeFeve:		1	Robert LeFever
01:35:03	2	15-minute watch or other level or watch is	01:38:28	2	7003.3 H?
01:35:07	3	insufficient?	01:38:11	3	A. I believe it's Security and
01	4	A, Correct.	G1:38:19	4	Supervision.
o. ·	5	Q. And "other level," meaning other	01:32:16	5	<ul> <li>Q. That's in the minimum standards;</li> </ul>
01:35:10	6	than constant?	이:38:12	6	correct?
91:35:11	7	A. Yes; a lesser level.	or;\$8:19	7	A. Yes.
01:35:14	8	Q. Was that memorandum shown to the	91:36:29	8	Q. It also says in this Chairman's
G1:35:16	9	members in attendance at the training?	95:38:25	9	Memorandum that if the objective is to prevent
01:35:19	10	A. I believe so.	00:39:27 1	10	suicide, only constant observation is effective;
C1:35:31	11	MS. BERG: I'd like to have	a::3839 <b>1</b>	11	correct?
çt; <b>35</b> ∆2	12	marked as Exhibit 34 a copy of the	67:36:91 <b>1</b>	12	A. Correct.
91:05:37	13	Chairman's Memorandum Number 17-99,	01:0501 1	13	Q. Was that covered as part of the
01:05HZ	14	November 1, 1999.	01505Z <b>1</b>	4	training, then, since 1999, when this memorandum
91:35:43	15	(Whereupon, Chairman's Memorandum	012825 1	15	was discussed?
D1:35:45	16	17-99, November 1, 1999, was marked as	012026 1	16	A. Yes.
01:36:53	17	Plaintiff's Exhibit No. 34, for id.)	01:38:38 1	17	Q. And in terms of constant observation
01:36:56	18	Q. I'm just showing you Exhibit 34.	c4:38:43 <b>1</b>	18	being the only effective method, do you have any
01:36:56	19	(Handing)	01:38:47 1	19	explanation as to why, then, Putnam County's
ų1:37.05	20	Do you recognize that as the	01:52:51 2	20	policies and procedures didn't say that?
C1:37 O1	21	Chairman's Memorandum from November 1, 1999?	o::360 Z	21	A. No.
61:07:04	22	A. Yes.	j::359\$2 <b>2</b>	22	Q. Since the time that Spencer Sinkov
01:07:04	23	Q. And do you recall if that	05:08:11 2	23	died in the Putnam County Correctional Facility,
ot:27:06	24	memorandum, the substance of it was discussed at	01:29:14 2	24	have there been any modifications to any of the
<b>31 27:29</b>		each of the training sessions you've attended	01:39:16 2	25	policies which relate in any way to suicide
		COMPU-TRAN SHORTHAND REPORTING			COMPU-TRAN SHORTHAND REPORTING
_					
		90			92
	1			1	92 Robert LeFever
01:37:11	1 2	90	01:39:19	1 2	
01:37:11 01:37:15	_	90 Robert LeFever	01:39:19 01:58:19	-	Robert LeFever prevention? A. No.
	3	90 <b>Robert LeFever</b> since 1988 or I'm sorry; I should say, since	!	-	Robert LeFever prevention?
G1:37:15	2	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.	01:58:19 05:38:19	-	Robert LeFever prevention? A. No.
01:37:15 01:37:15	2 3 4	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so.	01:58:19 05:38:19	2 3 4	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess
01:37:15 01:37:15 01:37:15	2 3 4	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything	01:58:19 05:38:19 01:38:25 01:39:26	2 3 4 5	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)
01:37:15 01:37:15 01:37:18 01:37:18	2 3 4	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or	01:58:19 05:38:19 01:39:25 01:39:26	2 3 4 5 6	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess
01:37:15 01:37:15 01:37:18 01:37:18 01:37:18 01:37:90	2 3 4	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this	01:38:19 05:38:19 01:39:25 01:39:25 01:39:25	2 3 4 5 6 7	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)
01:37:15 01:37:15 01:37:15 01:37:18 01:97:28 01:97:20	2 3 4 5 6 7 8	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?	01:38:19 05:38:19 01:39:25 01:39:25 01:39:25 01:45:21	2 3 4 5 6 7 8 9	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG:
61:37:15 61:37:15 61:37:15 61:37:18 61:37:18 91:37:20	2 3 4 5 6 7 8 9	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum? A. No.	01:58:19 05:38:19 01:39:25 01:39:26 01:39:25 01:45:21 01:46:21	2 3 4 5 6 7 8 9	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an
01:37:15 01:37:15 01:37:15 01:37:16 01:37:16 01:37:20 01:37:23 91:37:24	2 3 4 5 6 7 8 9 10	90  Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first	01:58:19 05:39:19 01:39:25 01:39:25 01:39:25 01:45:21 01:46:23 01:46:23	2 3 4 5 6 7 8 9 10 11	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.
01:37:15 01:37:15 01:37:15 01:37:16 01:37:16 01:07:20 01:07:20 01:07:20 01:07:20 01:07:24	2 3 4 5 6 7 8 9 10 11 12	since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was	O1:38:19  D5:38:19  D1:38:25  D1:38:25  D1:39:25  D1:45:21  D1:46:21  C1:46:23  C1:46:23	2 3 4 5 6 7 8 9 10 11	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before.
01:37:15 01:37:15 01:37:15 01:37:18 01:37:18 01:37:20 01:37:20 01:37:20 01:37:30	2 3 4 5 6 7 8 9 10 11 12 13	since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in	01:38:19 05:38:19 01:38:25 01:38:25 01:45:21 01:45:21 01:45:23 01:45:23 01:45:24	2 3 4 5 6 7 8 9 10 11 12 13	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead.
01:37:15 01:37:15 01:37:15 01:37:16 01:37:16 01:37:20 01:37:20 01:37:20 01:37:20 01:37:20	2 3 4 5 6 7 8 9 10 11 12 13	since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just	01:38:19 05:38:19 01:38:25 01:38:25 01:38:25 01:45:21 01:46:21 01:46:21 01:46:21 01:46:21 01:46:21 01:46:21	2 3 4 5 6 7 8 9 10 11 12 13	prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in
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01:37:15 01:37:15 01:37:15 01:37:06 01:37:00 01:07:20 01:07:20 01:07:24 01:07:04 01:07:04 01:07:05	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just summarizing.  A. Oh.	01:38:19 01:38:25 01:39:25 01:39:25 01:45:21 01:45:21 01:45:24 01:45:24 01:45:24 01:45:24 01:45:24 01:45:24 01:45:24	2 3 4 5 6 7 8 9 10 11 2 13 4 15 16	prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in regards to the forms.  No, but we added a step. The
01:37:15 01:37:15 01:37:16 01:37:16 01:37:20 01:37:20 01:37:24 01:37:24 01:37:45 01:37:46 01:37:46	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just summarizing.  A. Oh. Q. In which it was determined that	01:38:19 05:38:19 01:38:25 01:39:25 01:39:25 01:45:21 01:45:23 01:45:23 01:45:24 01:45:24 01:45:25 01:45:26 01:45:26 01:45:26	2 3 4 5 6 7 8 9 10 11 2 3 14 15 16 17	prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in regards to the forms.  No, but we added a step. The sergeants now have to go and review all the
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01:37:15 01:37:15 01:37:16 01:37:16 01:37:20 01:37:20 01:37:24 01:37:45 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just summarizing.  A. Oh. Q. In which it was determined that supervisory-visit intervals that were shortened from 30 minutes to 15 minutes for suicide prevention precautions was, quote, "plainly	01:38:19 01:38:25 01:39:25 01:39:25 01:45:21 01:45:21 01:45:23 01:45:23 01:45:23 01:45:23 01:45:23 01:45:23	2 3 4 5 6 7 8 9 10 1 12 3 4 5 16 17 18 19	prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in regards to the forms.  No, but we added a step. The sergeants now have to go and review all the intakes and sign off on them.  Q. And when you say "all the intakes,"
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01:37:15 01:37:15 01:37:06 01:37:06 01:37:00 01:37:20 01:37:20 01:37:20 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40 01:37:40	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just summarizing.  A. Oh. Q. In which it was determined that supervisory-visit intervals that were shortened from 30 minutes to 15 minutes for suicide prevention precautions was, quote, "plainly inadequate and in violation of Section 7003.3 H."  Do you recall if that's the	01:38:19 01:38:25 01:39:25 01:39:25 01:45:21 01:45:24 01:45:24 01:45:24 01:45:25 01:45:24 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25	2 3 4 5 6 7 8 9 10 1 12 3 4 15 6 7 8 9 10 1 12 3 4 15 16 17 8 19 22 1 22 3	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in regards to the forms.  No, but we added a step. The sergeants now have to go and review all the intakes and sign off on them. Q. And when you say "all the intakes," you mean the suicide prevention form?  A. And the medical screening, yes. Q. Part of the same packet? A. Yes.
01:37:15 01:37:15 01:37:16 01:37:26 01:37:20 01:37:24 01:37:24 01:37:45 01:37:45 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just summarizing.  A. Oh. Q. In which it was determined that supervisory-visit intervals that were shortened from 30 minutes to 15 minutes for suicide prevention precautions was, quote, "plainly inadequate and in violation of Section 7003.3 H."  Do you recall if that's the substance of what was communicated to you during the training?  A. Yes.	01:38:19 01:38:25 01:39:25 01:39:25 01:45:21 01:45:24 01:45:24 01:45:24 01:45:24 01:45:24 01:45:24 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25 01:45:25	2 3 4 5 6 7 8 9 10 11 2 13 4 5 16 17 8 9 20 12 23 24	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in regards to the forms.  No, but we added a step. The sergeants now have to go and review all the intakes and sign off on them. Q. And when you say "all the intakes," you mean the suicide prevention form?  A. And the medical screening, yes. Q. Part of the same packet? A. Yes. Q. And when was that step added? A. A year and a half ago.
01:37:15 01:37:15 01:37:16 01:37:16 01:37:20 01:37:20 01:37:24 01:37:24 01:37:45 01:37:45 01:37:45 01:37:45 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46 01:37:46	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Robert LeFever  since 1988 or I'm sorry; I should say, since 1999.  A. I believe so. Q. And do you recall if anything specific was highlighted at that time, in or around '99, as to the issuance of this memorandum?  A. No. Q. On the second page, the first paragraph refers to an investigation that was conducted by the Medical Review Board, in which the second page at the top, I'm just summarizing.  A. Oh. Q. In which it was determined that supervisory-visit intervals that were shortened from 30 minutes to 15 minutes for suicide prevention precautions was, quote, "plainly inadequate and in violation of Section 7003.3 H."  Do you recall if that's the substance of what was communicated to you during the training?	01:38:19 05:38:19 05:38:19 01:38:25 01:39:25 01:45:21 01:45:21 01:45:24 01:45:24 01:45:24 01:45:25 01:45:24 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45 01:45:45	2 3 4 5 6 7 8 9 10 11 2 13 4 5 16 17 8 9 20 12 23 24	Prevention?  A. No. Q. Do you recall any modifications to any?  (Cell phone interruption and recess held from 12:47 to 12:53 p.m.)  CONTINUED EXAMINATION BY MS. BERG: Q. I understand you want to change an answer.  A. Yes; clarify from before. Q. Go ahead. A. You said, did we change anything in regards to the forms.  No, but we added a step. The sergeants now have to go and review all the intakes and sign off on them. Q. And when you say "all the intakes," you mean the suicide prevention form?  A. And the medical screening, yes. Q. Part of the same packet? A. Yes. Q. And when was that step added? A. A year and a half ago.

	_	Case 7:07-cv-02866-CS-GAY	t 23-17	Filed 05/07/2008 Page 12 of 13 <sup>15</sup> Robert LeFever
	1	Robert LeFever	1	
01:46:07	2	policy or procedure?	01:47:09 2	Q, And how about the amended time?
01:46:38	3	A. No.	D5:47:41 <b>3</b>	A. February of 2006.
ů1	.4	Q. How was the staff then notified of	02:47:43 4	Q. And do you recall what was amended
ů.	- 5	this additional step?	05:47:45 5	in 2006?
Q1;48:13	6	A. They were told.	02:47:47 6	A. No, but it's right here on the
û]: <del>4</del> 8:14	7	Q. And did you actually tell them or	05:47:50 7	front; we added significant events and
01:48:21	8	somebody efse?	05,47:54	activities.
01:46:21	9	A. I did, yes, and someone else.	01:47.55	Q. That's the title, if you will, to
01:45:22		Q. Each member of the staff?	01:4501 10	this section that was added on Page 3, Number 2?
01:46:20		A. Yes.	01:46:05 11	A. Yes.
01:46:24		Q. And was that in some kind of a group	01:48:00 12	Q. Before February 23, 2006, was there
01:46:26		setting?	01:48:14 13	anything in the procedure that indicated on Page
G1:46:2E	14	A. No; individually.	B1.46.21 14	Z, letter H, 15-minute supervisory visits are not
01:46:28	15	<ol> <li>Was it reduced to writing anywhere,</li> </ol>	a134924 <b>15</b>	adequate as suicide prevention precaution?
¢1;46;59	16	as far as you know?	01.48:27 16	A. Yes.
61:48:32	17	A, No.	01,4828 ,17	Q. And do you recall when that
01:40:32	18	Q. Prior to the year and a half ago	01:1829 18	provision was part of this policy, either from
00:48:34	19	when this step was added, what was the difference	01:40:30 19	Inception or at some point thereafter?
51:48.38	20	in terms of the practice?	c1:x8:35 20	A. November of '05.
Q1:48.40	21	A. They were supposed to look at it.	c1:48:36 <b>21</b>	Q. Are these procedures kept in the
} 21,45;44	22	It wasn't required. You know, it was recommended,	мяяят 22	Facility?
01:48:45	23	but it wasn't required.	ен жамт 23	A. Yes.
21048048	24	Q. They didn't have to sign off on it?	or;48;4≥ <b>24</b>	Q. And what is the method of
01:45:49		A. No, they didn't have to sign off on	di;48:50 <b>25</b>	distribution of a procedure? Is this the one
		COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
Η .				
		94		96
	1	94 Robert LeFever	1	96 Robert LeFever
01:45:51	1 2		1 01:45:53 2	·
01:46:50 01:46:52		Robert LeFever	1 01:45:53 2 01:45:66 3	Robert LeFever
		it.  Q. Any other changes in any policies or	_	Robert LeFever that goes into the housing unit and booking
01:46:52		Robert LeFever	01:45:55 3	Robert LeFever that goes into the housing unit and booking officer books?
01:46:52 01:47:52	3 4	it. Q. Any other changes in any policies or procedures or practices? A. No.	01:45:65 3 01:48:57 4	Robert LeFever that goes into the housing unit and booking officer books? A. Yes.
01:46:52 01:47:02 01:47:05 01:47:05	3 4	it. Q. Any other changes in any policies or procedures or practices? A. No. Q. Did you ever see Exhibit 18??	01:48:65 3 01:48:57 4 01:48:57 5	Robert LeFever that goes into the housing unit and booking officer books? A. Yes. Q. Is there any verbal notification to
01:47:08 01:47:08 01:47:08 01:47:08	2 3 4 5 6	it. Q. Any other changes in any policies or procedures or practices? A. No.	01:45:66 3 01:48:57 4 01:48:57 5 01:49:00 6	Robert LeFever  that goes into the housing unit and booking  officer books?  A. Yes. Q. Is there any verbal notification to  officers that a new procedure came out or an
01:47:08 01:47:08 01:47:05 01:47:05 01:47:09	2 3 4 5 6 7	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes.	01:48:07 4 01:48:27 5 01:48:27 5 01:49:29 7	Robert LeFever  that goes into the housing unit and booking  officer books?  A. Yes.  Q. Is there any verbal notification to  officers that a new procedure came out or an amendment came out?
01:47:05 01:47:05 01:47:05 01:47:05 01:47:09 01:47:09	2 3 4 5 6 7 8	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes. Q. And it has an effective date of	01:48:66 3 01:48:27 4 01:48:27 5 01:49:20 6 01:49:29 7 91:49:24 8	Robert LeFever  that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes.
01:46:52 01:47:05 01:47:05 01:47:05 01:47:05 01:47:09 01:47:19	2 3 4 5 6 7 8 9	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes.	01:48:07 4 01:48:07 5 01:49:09 6 01:49:49 7 91:49:44 8 01:49:00 9	Robert LeFever  that goes into the housing unit and booking  officer books?  A. Yes.  Q. Is there any verbal notification to  officers that a new procedure came out or an amendment came out?  A. Currently, yes.  Q. How about before?
01:47:05 01:47:05 01:47:05 01:47:05 01:47:09 01:47:09	2 3 4 5 6 7 8 9 10	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes. Q. And it has an effective date of August 12th, '05.	01:48:65 3 01:48:27 4 01:48:27 5 01:49:20 6 01:49:20 7 91:49:24 8 01:49:20 9 01:49:20 10	Robert LeFever  that goes into the housing unit and booking  officer books?  A. Yes.  Q. Is there any verbal notification to  officers that a new procedure came out or an amendment came out?  A. Currently, yes.  Q. How about before?  A. No.
01:46:52 01:47:02 01:47:05 01:47:05 01:47:05 01:47:09 01:47:09 01:47:14 01:47:14	2 3 4 5 6 7 8 9 10 11 12	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that?	01:48:07 4 01:48:07 5 01:49:00 6 01:49:00 7 91:49:00 9 01:49:00 10 01:49:00 10	Robert LeFever  that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place?
01:46:52 01:47:02 01:47:05 01:47:05 01:47:05 01:47:09 01:47:09 01:47:14 01:47:14 01:47:15	2 3 4 5 6 7 8 9 10 11 12 13	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that?  A. Yes. Q. And it has a date of amendment of	01:48:66 3 01:48:27 4 01:48:27 5 01:49:29 6 01:49:29 7 91:49:24 8 01:49:24 9 01:49:24 10 01:49:24 11	Robert LeFever  that goes into the housing unit and booking  officer books?  A. Yes.  Q. Is there any verbal notification to  officers that a new procedure came out or an amendment came out?  A. Currently, yes.  Q. How about before?  A. No.  Q. When did that come into place?  A. A year and a half ago.
01:46:62 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:14 01:47:14 01:47:15 01:47:15	2 3 4 5 6 7 8 9 10 11 12 13 14	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that? A. Yes. Q. And it has a date of amendment of February 23rd, '06.	01:48:65 3 01:48:27 4 01:48:27 5 01:49:29 6 01:49:29 7 91:49:20 9 01:49:20 10 01:49:20 10 01:49:20 11	that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place? A. A year and a half ago. Q. And what happened a year and a half ago?
01:46:52 01:47:05 01:47:05 01:47:05 01:47:05 01:47:09 01:47:09 01:47:14 01:47:14 01:47:15 01:47:15 01:47:15 01:47:17	2 3 4 5 6 7 8 9 10 11 12 13 14 15	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that?  A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that?	01:4866 3 01:48:27 4 01:48:27 5 01:49:29 7 91:48:29 8 01:49:29 9 01:48:29 10 01:48:29 11 01:48:29 12 01:48:29 13 01:48:29 13	that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place? A. A year and a half ago. Q. And what happened a year and a half ago?  A. I put them all in the books myself,
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01:46:52 01:47:02 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:17 01:47:18 01:47:19 01:47:19	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that?  A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that?  A. Yes. Q. It's entitled a "Procedure;" correct?	01:48:07	that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place? A. A year and a half ago. Q. And what happened a year and a half ago?  A. I put them all in the books myself, now. And there's also one at briefing for 30 days, which is — the staff has to read it and sign for it.
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01:46:52 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that? A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that? A. Yes. Q. It's entitled a "Procedure;" correct? A. Yes. Q. And do you recall when, if at all,	01:48:07	that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place? A. A year and a half ago. Q. And what happened a year and a half ago?  A. I put them all in the books myself, now. And there's also one at briefing for 30 days, which is — the staff has to read it and sign for it. Q. So, this would have been sometime at the end of '06 that you began this procedure?
01:46:52 01:47:02 01:47:03 01:47:05 01:47:05 01:47:05 01:47:15 01:47:15 01:47:15 01:47:16 01:47:19 01:47:19 01:47:19 01:47:19 01:47:19 01:47:19 01:47:19 01:47:19 01:47:19	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that?  A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that?  A. Yes. Q. It's entitled a "Procedure;" correct?  A. Yes. Q. And do you recall when, if at all, this procedure was either distributed or given	01:48:07	that goes into the housing unit and booking officer books?  A. Yes.  Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes.  Q. How about before?  A. No.  Q. When did that come into place?  A. A year and a half ago.  Q. And what happened a year and a half ago?  A. I put them all in the books myself, now. And there's also one at briefing for 30 days, which is — the staff has to read it and sign for it.  Q. So, this would have been sometime at the end of '06 that you began this procedure?  A. Yes.
01:46:52 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing) A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that? A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that? A. Yes. Q. It's entitled a "Procedure;" correct? A. Yes. Q. And do you recall when, if at all, this procedure was either distributed or given verbally to staff at the jall?	01:48:00 3 01:48:07 4 01:48:07 5 01:49:00 6 01:49:00 7 01:49:00 10 01:49:00 10 01:49:00 12 01:49:00 13 01:49:00 13 01:49:00 15 01:49:00 16 01:49:00 17 01:49:00 17 01:49:00 17 01:49:00 20 01:49:00 22	that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place? A. A year and a half ago. Q. And what happened a year and a half ago?  A. I put them all in the books myself, now. And there's also one at briefing for 30 days, which is — the staff has to read it and sign for it. Q. So, this would have been sometime at the end of '05 that you began this procedure? A. Yes. Q. And whose determination was it to
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01:46:52 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:15 01:47:15 01:47:15 01:47:15 01:47:17 01:47:18 01:47:17 01:47:18 01:47:19 01:47:19 01:47:22 01:47:22 01:47:22	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that? A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that? A. Yes. Q. It's entitled a "Procedure;" correct?  A. Yes. Q. And do you recall when, if at all, this procedure was either distributed or given verbally to staff at the jall?  A. The first time or the amended time? Q. The first time.	01:48:07	that goes into the housing unit and booking officer books?  A. Yes.  Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes.  Q. How about before?  A. No.  Q. When did that come into place?  A. A year and a half ago.  Q. And what happened a year and a half ago?  A. I put them all in the books myself, now. And there's also one at briefing for 30 days, which is — the staff has to read it and sign for it.  Q. So, this would have been sometime at the end of '06 that you began this procedure?  A. Yes.  Q. And whose determination was it to change the procedure for distributing jail procedures?
01:46:52 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:05 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:15 01:47:25 01:47:25	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	it.  Q. Any other changes in any policies or procedures or practices?  A. No. Q. Did you ever see Exhibit 18??  (Handing)  A. Yes. Q. And it has an effective date of August 12th, '05. Do you see that? A. Yes. Q. And it has a date of amendment of February 23rd, '06. Do you see that? A. Yes. Q. It's entitled a "Procedure;" correct? A. Yes. Q. And do you recall when, if at all, this procedure was either distributed or given verbally to staff at the jall?  A. The first time or the amended time?	01:48:00 3 01:48:07 4 01:48:07 5 01:49:00 6 01:49:00 7 01:49:00 10 01:49:00 10 01:49:00 11 01:49:00 13 01:49:00 13 01:49:00 14 01:49:00 17 01:49:00 17 01:49:00 17 01:49:00 20 01:49:00 21 01:49:00 22 01:49:40 23	that goes into the housing unit and booking officer books?  A. Yes. Q. Is there any verbal notification to officers that a new procedure came out or an amendment came out?  A. Currently, yes. Q. How about before? A. No. Q. When did that come into place? A. A year and a half ago. Q. And what happened a year and a half ago?  A. I put them all in the books myself, now. And there's also one at briefing for 30 days, which is — the staff has to read it and sign for it. Q. So, this would have been sometime at the end of '06 that you began this procedure? A. Yes. Q. And whose determination was it to change the procedure for distributing jail

	4	Case	7:07-cv-02866-CS-GAY Docume	nt 23-	17 1	Filed	05/07/2008 Page 13 of 13
	2	. Q.	Did anybody else has a role in that	015127	2	supervisor	y .sits are not adequate as a suicide
01:49 <i>A</i> S	3	decision?	old allybody clot have a rate in that		3	•	precaution?
Q1;49±0	4	<b>A</b> .	No.		4	Α.	I don't understand the question.
91-	5	Q.	Did you consult with anybody about it?		5	Q.	Did you tell anybody that you were
D.	6	Α.	No.	ļ	6		eople, other correction officers, were
01:49:50	7	Q.	What prompted you to do it?	1		-	of that provision?
01:49:53	8	Α.	Better accountability.		8	A.	No.
01:49:55	9	Q.	Anything else?		9	Q.	Did you take any steps as a result
01:49:59	•	A.	No.	01:51:43 1	0	of learning	that?
01.49:50		Q.	So, when this procedure was amended	c1:5t:44 <b>1</b>		A.	No.
01 49:50			er of 2005 to say 15-minute supervisory	01:51:45		Q.	For example, have somebody go over
01:50:10			ot adequate as a suicide prevention	01-51 49 1	3		ng, this procedure, to make sure that
01:52/12			, at that time the procedure would have	n1:51:52 <b>1</b>	4		was aware of it?
01:5015		•	n placed in the housing unit and	01#1#6 1	5	A.	I don't remember.
, 01,6000		booking to	*	g1:\$1:52 <b>1</b>	6	Q,	Do you recall when this procedure,
01:50:21		Α.	Yes.	1 31:52:52 1	7	Exhibit 18,	, was actually placed into the
61:50:22		Q.	Or procedure books?	01:5204 1	8	procedure	books at the housing units and the
01:50.23		Α.	Procedure books, yes.	01:62:08 1	9	booking ro	oom?
0::5324		Q.	Did you ever come to learn at any	01:52:07 2	0	A.	Sometime in February/March of '06.
91# <b>0</b> 28			ne that correction officers and	a1:52:10 Z	1	Q.	Are you sure of that?
01:50:28		•	were not aware of that provision that I	0::52:11 2	22	A.	Am I sure of that?
01:90:21		•	peing added to the procedure?	91:5213 2	23	Q.	Yes.
81:50:33		Α.	Yes.	01:52:54 2	4	A.	It was given to someone it was
; m1·5034		Q.	How did you first learn about that?	01:52:16 2	25		people to put out.
1		(	COMPU-TRAN SHORTHAND REPORTING	<u> </u>		•	COMPU-TRAN SHORTHAND REPORTING
l							400
Γ.			98	,			100
	1		98 Robert LeFever		1		Robert LeFever
0t:50ta5	1 2	A.		01 52 57	1 2	Q.	Robert LeFever Who did you give it to?
01:50:35 01:50:38	1 2 3	A. summer.	Robert LeFever	o1 52 57 01 €2.19	1 2 3	A.	Robert LeFever Who did you give it to? I don't remember.
!	1 2 3 4		Robert LeFever	1	_	A. Q.	Robert LeFever Who did you give it to? I don't remember. Do you know if it actually made it
04:50:38 }	1 2 3 4 5	summer.	Robert LeFever Somebody mentioned it during last In '07? Yes.	01 = 2.19	3	A. Q. into the lo	Robert LeFever Who did you give it to? I don't remember.
54:5038 01:2038	1 2 3 4 5	summer. Q.	Robert LeFever Somebody mentioned it during last In '07?	01 를 2.19 01 출원후:	3 4 5 6	A. Q. into the lobooks?	Robert LeFever  Who did you give it to?  I don't remember.  Do you know if it actually made it agbooks? I'm sorry; into the procedure
01:50:38 01:50:38	-	summer. Q. A.	Robert LeFever Somebody mentioned it during last In '07? Yes.	01 ±2.19 01 ±0.00 01 ±0.00 01:52:25	3 4 5 6 7	A. Q. into the lobooks?	Robert LeFever  Who did you give it to?  I don't remember.  Do you know if it actually made it agbooks? I'm sorry; into the procedure  No.
01:50:38 01:50:38 01:50:36 01:50:40	7	summer. Q. A. Q.	Robert LeFever Somebody mentioned it during last In '07? Yes. Do you recall who mentioned that to No, I do not.	01 ±2.19 01 ±2.24 01:52:24 05:57:25	3 4 5 6	A. Q. into the lobooks?  A. Q.	Robert LeFever  Who did you give it to?  I don't remember.  Do you know if it actually made it ogbooks? I'm sorry; into the procedure  No.  And did you, at any point in time,
01:50:38 01:50:38 01:50:36 01:50:40 01:50:41	7	Q. A. Q. you?	Robert LeFever Somebody mentioned it during last In '07? Yes. Do you recall who mentioned that to	01:52:19 01:52:29 01:52:29 01:52:29 01:52:25 01:52:25	3 4 5 6 7 8	A. Q. into the lobooks?  A. Q. give this p	Robert LeFever  Who did you give it to?  I don't remember.  Do you know if it actually made it agbooks? I'm sorry; into the procedure  No.  And did you, at any point in time, procedure to anybody to give out after
01:50:38 01:50:36 01:50:40 01:50:41	7 8 9	Q. A. Q. you?	Robert LeFever Somebody mentioned it during last  In '07? Yes. Do you recall who mentioned that to  No, I do not. Was it more than one person? It could've been.	01:52:19 01:52:25 01:52:25 01:52:25 01:52:25 01:52:34	3 4 5 6 7 8 9	A. Q. into the lobooks?  A. Q. give this parch of the lobooks?	Robert LeFever  Who did you give it to?  I don't remember.  Do you know if it actually made it agbooks? I'm sorry; into the procedure  No.  And did you, at any point in time, procedure to anybody to give out after 2006?
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